B.1.1

OhioEPA
State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

RE: Extension for NOD Response
Facility: Master Metals, Inc.
US ID: OHD097613871
OHIO ID: OHIO 02-18-0133

Rudy A. Zupan
Environmental Administrator
Master Metals, Inc.
2850 W. Third St.
Cleveland, Ohio 44113

Dear Mr. Zupan:

On November 18, 1991, Master Metals, Inc. was sent a Notice of Deficiency (NOD) by the Ohio Environmental Protection Agency (Ohio EPA), following a completeness/ technical adequacy review of the Part B permit application. In a letter dated January 10, 1992, you requested a thirty (30) day extension for submitting a response to the NOD comments. The Ohio EPA, through the normal course of the permitting process, allows 55 days for a facility to respond to a NOD.

As you may know, the permitting process requires a timely interaction between the Ohio EPA and any facility seeking a permit. Any delay in the NOD response will only impede the progress of the permitting procedure. The Ohio EPA realizes that certain unforeseen events may develop during the permit application process and the Agency will usually not object to a reasonable extension of the due date. The Ohio EPA respectfully requests Master Metal's cooperation in addressing the deficiencies of the Part B application by February 12, 1992 so that the Agency may continue the permitting procedure and remain within Agency time commitments.

Please be advised that failure to submit a complete permit application or to correct deficiencies in the application may result in (1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, (2) denial of the application for permit renewal, (3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action, or (4) your application for a renewal permit may be returned as incomplete.

When responding to the Part B deficiencies, if you have any questions regarding the permit application, please feel free to contact Linda Lagunzad of the Northeast District Office at (216) 425-9171.

Sincerely,

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Hazardous Waste Management

cc: Lisa Pierard, US EPA, Region V
Joel Morbito, US EPA, Region V
Tehmton Toorkey, CO, DHWM, OEPA
Jim Tichich, CO, DHWM, OEPA
Frank Basting, CO, DHWM, OEPA
Linda Lagunzad, NEDO, DHWM, OEPA
Central File

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George V. Voinovich
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DON

CERTIFIED MAIL

November 18, 1991

FACILITY: Master Metals
NOTICE OF DEFICIENCY C1/TA1
OHIO ID: 02-18-0133
USEPA ID: OHD 097 613 871

Douglas Mickey, President
Master Metals Inc.
2850 West Third Street
Cleveland, Ohio 44113

Dear Mr. Mickey:

Thank you for your April 9, 1990 Part B application submittal.

The Ohio EPA Division of Hazardous Waste Management has conducted a completeness/technical adequacy review of your Part B application and has determined it to be incomplete and technically inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

We have enclosed completeness/technical adequacy comments that are the result of this review. Please provide detailed information addressing all areas indicated on the comment sheets to Ohio EPA within 55 days of the date of receipt of this correspondence. This submission shall be in accordance with the following editorial protocol or convention:

1. Old language is overstruck.

2. New language is capitalized.

3. Page headers should indicate date of submission.

4. If significant changes are necessary, pages should be renumbered, table of contents revised, and complete sections provided as required.

Please send one copy each to:

Tom Crepeau
Ohio EPA, DSHWM
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

Lisa Pierard
RCRA Activities
Part B Application
U.S. EPA - Region V 5HR-13
230 South Dearborn Street
Chicago, Illinois 60604

Please send two copies to:

Linda Lagunzad
Ohio EPA, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

In the course of the technical adequacy review, we may request additional information if it is necessary to clarify, modify, or supplement previous submissions of information in order to substantively evaluate the permit application for adequacy.

Failure to submit a complete permit application or to correct deficiencies in the application may result in the following: 1) revocation of your existing Ohio Hazardous Waste Facility Installation and Operation Permit, 2) denial of the permit application, 3) referral of the matter to the Ohio Attorney General's Office for appropriate enforcement action.

We request that the facility contact Linda Lagunzad, NEDO, at (216) 425-9171 within 10 days of receipt of this NOD to discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting. Thereafter, any questions concerning the review of this permit application and the level of detail expected, should also be addressed to the above mentioned person.

Sincerely,

Edwin Y. Lim

Edwin Y. Lim, Manager
RCRA Engineering Section
Division of Hazardous Waste Management

cc: Lisa Pierard, U.S. EPA
Joel Morbito, U.S. EPA
Tehmton Toorkey, CO, DHWM, Ohio EPA
Frank Basting, CO, DHWM, Ohio EPA
Pam Allen, CO, DHWM, Ohio EPA
Rhonda Rothschild, DMS, DHWM, Ohio EPA
Linda Lagunzad, NEDO, DHWM, Ohio EPA
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OhioEPA
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CERTIFIED MAIL

FACILITY: Master Metals
NOTICE OF DEFICIENCY C1/TA1
OHIO ID: 02-18-0133
USEPA ID: OHD 097 613 871

November 5, 1991

Douglas Mickey, President
Master Metals Inc.
2850 West Third Street
Cleveland, Ohio 44119

Dear Mr. Mickey:

Thank you for your April 9, 1990 Part B application submittal.

The Ohio EPA Division of Hazardous Waste Management has conducted a completeness/technical adequacy review of your Part B application and has determined it to be incomplete and technically inadequate. This application has been reviewed pursuant to the rules published in the Hazardous Waste Facility Standards Chapters in the Ohio Administrative Code and the corresponding Federal regulations.

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We request that the facility contact Linda Lagunzad, NEDO, at (216) 425-9171 within 10 days of receipt of this NOD to discuss each of the enclosed comments in order to make clear the information being requested. This can be accomplished by a conference call or meeting. Thereafter, any questions concerning the review of this permit application and the level of detail expected, should also be addressed to the above mentioned person.

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Central File

PART B REVIEW COMMENTS
MASTER METALS, CLEVELAND
OHD 097-613-871
02-18-0133

COMPLETENESS COMMENTS

GENERAL COMMENT

Master Metals should revise the Part B Permit Application to conform to the format of the RCRA Part B Permit Application Checklist (revision 8/89) in the Part B Permit Application. Each section of the checklist should also be addressed with those sections which are not applicable.

A PART A APPLICATION

1. Part A Application:
OAC 3745-50-40 & 41; 3745-50-42(A) & (D), 3745-50-43;

a. In January 1990 the EPA revised the Part A Application Hazardous Waste Permit Form. Master Metals must submit this new Application Form 8700-23 which replaces the older obsolete Forms 3510-1 & 3.

b. Master Metals must include under the process design capacities section of the Part A Application, the tanks which store either lead-acid battery casings, lead dross, lead glass picture tubes, lead baghouse flue dust, or lead-bearing slag. The bins that hold the hazardous wastes D008 and K069 are approximately 8'x30'x20' (HxLxW) with capacities of approximately 311,000 pounds of waste. Such bins, as determined by Ohio EPA , are considered to be tanks, and not containers, according to the regulatory definitions found in OAC 3745-50-10.

c. Master Metals must provide all information in the Part A Section of the application which would satisfy the requirements of OAC 3745-50-41. To satisfy the requirements of this rule, Master Metals may reference other portions of the application. OAC 3745-50-41 states that all applicants for permits shall provide the following information:

i. Up to four standard industrial codes which best reflect the principal products or services provided by Master Metals.

ii. A listing of all permits or approvals, state or federal, received or applied for, under any of the following programs:

- aa. Hazardous waste;
- bb. Underground injection control;
- cc. National pollutant discharge elimination system;
- dd. Prevention of significant deterioration (Clean Air Act);
- ee. Nonattainment (Clean Air Act);
- ff. National emission standards for hazardous pollutants;
- gg. Ocean dumping (Marine protection Research and Sanctuaries Act);
- hh. Dredge or fill (Clean Water Act); and
- ii. Other relevant environmental permits.

iii. A topographic map extending one mile beyond the property boundaries of the facility or activity. The map must clearly show the following:

- aa. The legal boundaries of the facility;
- bb. The location and serial number of each existing and proposed intake and discharge structures;
- cc. All hazardous waste management facilities;
- dd. Location of all processes listed in Item XII of Form 8700-23 identified by process code;
- ee. Each well where fluids are injected underground; and
- ff. All springs and surface water bodies in the area, plus all drinking water wells within one-quarter mile of the facility property boundary which are identified in the public record or otherwise known to Master Metals.

iv. A facility drawing which includes the general layout of the facility. The drawing must be to scale and fit on an 8 1/2" by 11" sheet of paper. This drawing must show the following:

aa. The property boundaries of the facility;
bb. The areas occupied by all storage, treatment or disposal operations that will be used during interim status;
cc. The name of each operation (Example: rotary kiln furnace, drum storage area, etc.);
dd. Areas of past storage, treatment or disposal operations;
ee. Areas of future storage, treatment, or disposal operations; and
ff. The approximate dimensions of the property boundaries and all storage treatment, and disposal areas.

v. Photographs that clearly delineate all existing structures, existing storage, treatment and disposal areas, and sites of future storage, treatment and disposal.

Photographs may be in color or black and white, ground-level or aerial. Indicate the date the photographs were taken on the back of each photograph. Use the process codes listed in Item XII of Form 8700-23 to indicate the location of all storage, treatment, and disposal areas.

vi. A brief description of the nature of the business.

vii. Indicate that Master Metals shall keep records of all dates used to complete permit applications and any supplemental information submitted in accordance thereto, for a period of three years from the date the application is signed.

B **FACILITY DESCRIPTION**

2. B-1 General Description:
OAC 3745-50-44(A)(1);

In addition to all referenced 40 CFR Citations, Master Metals provide the appropriate Ohio Administrative Code (OAC) Citations for each section of the Part B Permit.

3. B-2a General Requirements:
OAC 3745-50-44(A)(19);

a. Master Metals must provide on a facility site map the clearly defined locations of all drum, battery and bulk loading and unloading areas.

b. Master Metals must provide a map that clearly indicates the general location of all sewers (storm, sanitary, combined) and run-off control systems on-site.

c. Master Metals must provide a clearly identifiable Land Use Map, dated and referenced, with a scale of one inch is equal to no more than 200 feet, including map orientation. The map must locate nearby residential zoning and should extend to at least 1000 feet beyond the facility boundary. Describe the results of the Land Use Map as it pertains to Master Metals.

d. Master Metals must provide a map that indicates the methods of fire control. All fire hydrants must be labeled along the perimeter of the site. Include a description of all other related fire systems (such as water storage, etc.) if Master Metals has any. This information may be referenced from another section of the Permit application.

e. Master Metals must provide a map that clearly describes all nearby surface waters within 1,000 feet of the facility. The map must contain a scale of one inch equals no greater than 200 feet, map orientation and appropriate date and labels.

4. B-3b(1)(a) Flood Proofing and Flood Protection Measures:
OAC 3745-50-44(A)(11)(c), (d)(i) & (d)(ii);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

5. B-3b(1)(b) Flood Plan:
OAC 3745-50-44(A)(11)(d)(iii)(a) through (d);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

6. B-3b(2) Plan for Future Compliance With Floodplain Standard:
OAC 3745-50-44(A)(11)(d)(iii)(e);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

7. B-4 Traffic Information:
OAC 3745-50-44(A)(10);

a. Master Metals must provide a map of traffic access routes within the facility, including locations of all traffic control signs and signals, and describe all traffic procedures.

b. Master Metals must provide a certified engineer's calculations that all roadways and loading and unloading areas within the facility are capable of bearing loads up to 50,000 pounds per truck axle.

c. Master Metals must provide a traffic volume estimation which includes the number and type of vehicles on a normal operating day that both pass or enter into the facility. Indicate the time frame for which this traffic study was conducted. Also indicate who performed the traffic study and how the study relates to the facility.

C **WASTE CHARACTERIZATION**

8. C-1 Chemical and Physical Analyses:
OAC 3745-50-44(A)(2); 3745-54-13(A);

a. Master Metals must provide a full profile of all waste streams to be permitted for on-site storage, treatment, disposal or reclamation. In order to do this, Master Metals must identify all characteristic analyses used to screen for hazardous waste properties. Therefore, at the minimum, Master Metals must describe and provide rational for the following:

i. Detailed test methods for determining if waste streams are Ignitible, Reactive, Corrosive, supplemented by the Extraction Procedure (EP) Toxicity Test and/or the Toxicity Characterization Leaching Procedure;

ii. Any other chemical analyses that are performed for the Master Metals waste streams, such as analyses to determine physical characteristics and general chemical constituents of the waste streams; and

iii. Directed analyses performed for specific constituents, such as Appendix VIII constituents.

b. Master Metals must provide a chart that clearly describes the following:

i. Identification of each hazardous waste stream (i.e. slag, sulfuric acid, lead dross, flue dust, lead scrap, etc.);

ii. The basis for hazardous listing (hazardous codes associated with each waste stream);

iii. Where the waste stream is stored on-site; and

iv. Ultimate destination of the waste stream (i.e. sent off-site to a non-hazardous landfill, sent to Clean Harbors, placed in the kiln for reclamation, etc.).

c. Master Metals must provide a detailed chemical and physical analysis of a representative sample of each type of incoming waste.

9. C-1a Containerized Waste:
OAC 3745-50-44(C)(1)(b);

Reference or provide a description of the hazardous characteristics of the wastes to be handled in containers. Justify these results with laboratory analyses.

10. C-1b Waste in Tank Systems:
OAC 3745-55-91(B)(2); 3745-55-92(A)(2);

Master Metals must provide the hazardous characteristics of wastes to be handled in the tank systems on-site. The tank systems store either lead-acid battery casings, lead dross, lead glass picture tubes, lead baghouse flue dust, or lead-bearing slag.

11. C-2c Sampling Methods:
OAC 3745-54-13(B)(3);

a. Master Metals must identify and reference the sampling methods used to obtain a representative sampling of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste.

b. Master Metals must reference the section of the permit application that addresses the type of safety equipment to be worn by the sampling personnel during a sampling event.

c. Master metals must provide information regarding the health and safety factors to be taken into account by sampling personnel prior to a sampling event.

12. C-2e Additional Requirements for Wastes Generated Off-Site:
OAC 3745-54-13(C);

Master Metals must describe the procedures used to inspect and analyze a representative portion of wastes generated off-site. Master Metals must describe the statistical method used to determine a representative sample of the incoming wastes (e.g. number of drums to be sampled).

13. C-3a(3) Waste Characteristics: First Third Wastes With Treatment Standards:
OAC 3745-59-33(A) through (E); 3745-59-07(A), 3745-59-41 to 43;

Provide a complete description of the methods to be used to verify whether first third wastes received by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous waste off-site; and

d. a description of the operation control procedures used to properly classify wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for first third wastes.

14. C-3a(4) Waste Characteristics: Second Third Waste with Treatment Standard:
OAC 3745-59-34(A) through (G); 3745-59-41 to 43;

Provide a complete description of the methods to be used to verify whether second third wastes received by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous waste off-site; and

d. a description of the operation control procedures used to properly classify wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for second third wastes.

15. C-3a(5) Waste Characteristics: Third Third Wastes with Treatment Standards:
40 CFR 268.35 (a) through (j); 40 CFR 268.41 through 43;

Provide a complete description of the methods to be used to verify whether third third wastes received by the facility are restricted from land disposal. This description shall include the following information:

a. representative waste analyses from waste generators used to determine whether or not a waste is restricted from land disposal and the identification of the appropriate treatment standard;

b. for waste streams where generator knowledge is used to determine whether the waste is restricted from land disposal, representative information required from the generator to verify their classification of the waste;

c. sample land disposal restriction notifications submitted to the facility and used by the facility for shipments of hazardous waste off-site; and

d. a description of the operation control procedures used to properly classify wastes generated by the facility for the purposes of compliance with the land disposal restriction regulations for third third wastes.

16. C-3b(1) Retention of Generator Notices and Certifications:
OAC 3745-59-07(A);

Master Metals must describe the record keeping requirements for land disposal restriction notifications received by the facility and provided to off-site facilities.

17. C-3b(2) Notification and Certification for Wastes to be Further Managed:
OAC 3745-59-07(B)(6);

Master Metals must describe the procedures followed for the notification and certification regarding applicable land disposal restrictions for all hazardous wastes shipped from the facility to off-site facilities for further management.

D PROCESS INFORMATION

19. D-1a Containers with Free Liquids:
OAC 3745-55-71; 3745-55-72;

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

20. D-1a(1) Description of Containers:
OAC 3745-55-71; 3745-55-72;

a. Master Metals must provide the following for the batteries on-site: exact number, location, materials, dimensions, usable volumes, condition.

b. Master Metals must address whether batteries stored on-site will be placed on pallets in the battery cracking area.

c. Master Metals must indicate the type of markings and labels that are placed upon batteries at any time within the facility.

d. Master Metals must provide information that the battery materials will not react with, and are otherwise compatible with, other hazardous waste to be stored on-site so that the ability of these containers to contain the waste is not impaired.

e. Master Metals must reference the appropriate inspection logs that detail inspection of drums prior to their use and during their use to ensure structural integrity.

21. D-1a(2) Container Management Practices:
OAC 3745-55-73;

a. Master Metals must clearly describe the container management practices used to ensure that all hazardous waste batteries are not handled in a manner that may cause them leak.

b. Master Metals must indicate in the form of blueprints where batteries are stored prior to and after cracking, and where the tank is located that stores battery casings. Master Metals must also provide the maximum number, volume, and stacking height of batteries in the battery storage area.

22. D-1b(1) Test For Free Liquids:
OAC 3745-50-44(C)(1(b);

Under this section Master Metals must address whether it manages containers without free liquids. Master Metals shall supplement such information with laboratory analyses or other documentation.

23. D-1b(2) Description of Containers:
OAC 3745-55-71; 3745-55-72;

a. Master Metals must provide the following for all containers on-site: exact number, location, construction materials, dimensions, usable volumes, DOT specifications, manufacturer specifications, and condition (new, used reconditioned).

b. Master Metals must address whether containers on-site will be placed on pallets.

c. Master Metals must indicate the type of markings and labels that are placed upon containers at any time within the facility.

d. Master Metals must provide information that the container materials will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

24. D-1b(3) Container Management Practices:
OAC 3745-55-73;

a. Master Metals must clearly describe the container management practices used to ensure that all hazardous waste containers are always kept closed during storage, except when adding or removing waste, and are not handled in a manner that may cause them to rupture or leak.

b. Master Metals must indicate in the form of blueprints the aisle space maintained between rows and containers and provide the maximum number, volume, and stacking height of containers for each area in which the containers are stored.

25. D-1b(4) Container Storage Area Drainage:
OAC 3745-50-44(C)(1)(b)(ii); 3745-55-75;

Master Metals must describe how the storage area is designed or operated to drain and remove liquids unless containers are otherwise kept from contact with standing liquids.

26. D-2a Tank Systems Description:
OAC 3745-50-44(C)(2), 3745-55-94(A);

Due the August 1991 RCRA inspection of Master Metals and subsequent review of their Part B Pemit Application, Ohio EPA has determined that the bins that store hazardous wastes D008, K069 and D002 meet the definition of tanks as found in 3745-50-10 of the OAC. Therefore, Master Metals must provide, for each tank on-site, a description of its type (i.e. above ground, underground), its material of construction, volume, and number of tanks, as well as its specific location.

27. D-2a(1) Dimensions and Capacity of Each Tank:
OAC 3745-50-44(C)(2)(b);

Master Metals must provide the dimensions and capacity of each tank that holds D008 and K069 hazardous waste material on site.

28. D-2a(2) Description of Feed Systems, Safety Cutoff, Bypass Systems and Pressure Controls:
3745-50-44(C)(2)(c), 3745-55-94(B);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

29. D-2a(3) Diagram of Piping, Instrumentation and Process Flow:
OAC 3745-50-44(C)(2)(d);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

30. D-2a(4) Ignitable, Reactive and Incompatible Wastes:
OAC 3745-50-44(C)(2)(j), 3745-54-17(B), 3745-55-98 & 99;

Master Metals must address whether material placed into the Charge Bin tank is incompatible. Address the mixing of D008, K069 and D002 waste streams.

31. D-2b Existing Tank System's Integrity:
OAC 3745-50-44(C)(2)(a), 3745-55-92(A);

Master Metals must clarify if the tanks present at the facility are existing tanks. If so, Master Metals must follow the requirements outlined for this section of the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

32. D-2c New Tank Systems:
OAC 3745-50-44(C)(2)(f), 3745-55-92(B) to (E);

Master Metals must clarify if the tanks present at the facility are new tanks. If so, Master Metals must follow the requirements outlined for this section of the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

33. D-2d(1) Plans and Description of the Design, Construction, and Operation of the Secondary Containment System: OAC 3745-50-44(C)(2)(g), 3745-55-93(A) to (F);

a. Master Metals must specify the age of all existing tank systems to determine when requirements for secondary containment and leak detection will take effect. If the age of the tank cannot be determined, Master Metals must indicate the reason.

b. Master Metals must demonstrate that the secondary containment systems for each tank located on-site has been or will be designed, installed and operated to prevent any migration of waste or accumulated liquid from the tank system to the soil, groundwater, or surface water at any time during its use. Also, Master Metals must demonstrate that the secondary containment system can detect and collect releases and accumulated liquids. Requirements for this demonstration may be found under this section of the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

34. D-2d(1)(c) Requirements for External Liner, Vault, Double-Walled Tank or Equivalent Device: OAC 3745-50-44(C)(2)(g), 3745-55-93(D) and (E);

Master Metals must show that the secondary containment for each tank includes at least one of the following: a liner external to the tank, a vault, a double-walled tank, or an equivalent device approved by the Director. Once Master Metals determines which secondary containment system is applicable to the on-site tanks, it must follow those requirements for that system as indicated under this section of the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

35. D-2d(1)(d) Secondary Containment and Leak Detection Requirements for Ancillary Equipment: OAC 3745-50-44(C)(2)(g), 3745-55-93(F);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

36. D-2d(2) Requirements for Tank Systems Until Secondary Containment is Implemented:
OAC 3745-55-93(I);

For the above ground tanks that are in existence at the facility, Master Metals must provide the results of a leak test or present a schedule and procedures for assessing the overall condition of the tank system by an independent, qualified professional engineer until secondary containment is provided. Indicate that such procedures will be used to ensure that such tests will be repeated annually until secondary containment is provided.

37. D-2d(3) Variance from Secondary Containment Requirements:
OAC 3745-55-93(G), 3745-55-94;

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

38. D-2e Controls and Practices to Prevent Spills and Overflow:
OAC 3745-50-44(C)(2)(i), 3745-55-94(A) & (B), 3745-55-95;

Master Metals must provide adequate information to ensure that the hazardous wastes placed in the tank systems will not cause any element of the system to rupture, leak, corrode or other wise fail. Specific requirement of this section can be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

F **PROCEDURES TO PREVENT HAZARDS**

39. F-1a(1) 24-Hour Surveillance System:
OAC 3745-54-14(B), 3745-50-44(A)(4);

Master Metals must provide a map that clearly indicates where all facility gates, guardhouses, and fences are located.

40. F-1a(2)(b) Means to Control Entry:
OAC 3745-54-14(B)(2)(b); 3745-50-44(A)(4);

a. Under this section Master Metals must address whether it has a means to control entry at all times, including weekends, evenings and holidays.

b. Master Metals must provide a copy of the standard operating procedures for security at each gate.

c. Master Metals must indicate what procedures are followed for visitors and if a visitors log is signed. If a visitors log is signed by visitors, Master Metals must provide a copy of a representative page from such a log.

41. F-1b Waiver:
OAC 3745-54-14(A);

Master Metals must indicate if a waiver of the security procedures or equipment is requested.

42. F-2b(2)(a) Tank System External Corrosion and Release:
OAC 3745-55-95;

Master Metals must provide for the above-ground portions of the tank systems on-site, daily inspections to detect external corrosion or release of waste.

43. F-2b(2)(b) Tank System Construction Materials and Surrounding Area:
OAC 3745-54-95(B)(3);

Master Metals must demonstrate that the construction materials and the area immediately surrounding the externally accessible portions of the tank systems, including the secondary containment systems, are inspected daily to detect erosion or signs of releases of hazardous waste.

44. F-2b(2)(c) Tank System Overflowing Equipment:
OAC 3745-55-95(A);

Master Metals must develop a schedule and demonstrate that it will be followed for inspecting tank system overfill controls.

45. F-2b(2)(d) Tank System Monitoring and Leak Detection Equipment:
OAC 3745-55-95(B)(2);

Master Metals must demonstrate that data gathered from monitoring and leak detection equipment, where present, is inspected daily to ensure that the tank is operated according to design specifications.

46. F-2b(2)(e) Tank System Cathodic Protection:
OAC 3745-55-95(C);

For clarity and consistency with the Technical Adequacy Checklist, Master Metals must address whether this section applies to the facility. A description of the requirements for this section may be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rule.

47. F-3a(1) Internal Communications:
OAC 3745-54-32(A);

a. Master Metals must describe the internal communications or alarm system used to provide immediate emergency instruction to facility personnel.

b. In case of an emergency, Master Metals must describe the appropriate measures to be taken by an emergency dispatcher and who will be notified.

48. F-3a(2) External Communications:
OAC 3745-54-32(B);

Master Metals must identify the device, such as a telephone, that will be used for summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

49. F-3a(3) Emergency Equipment:
OAC 3745-54-32(C);

Master metals must demonstrate in the form of inventory tables and maps that the following are present at the facility: portable fire extinguisher, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

50. F-3a(4) Water for Fire Control:
OAC 3745-54-32(D);

Master Metals must demonstrate that the facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems. Maps and descriptions of the water supply for fire protection must be provided.

51. F-3b Aisle Space Requirements:
OAC 3745-54-35;

Master Metals must indicate that aisle space is maintained to allow for unobstructed movement of emergency equipment into the drum storage area and that the aisle space allows for effective inspections of the area. Reference appropriate blueprint drawings that detail exact aisle widths.

52. F-4c Water Supplies:
OAC 3745-50-44(A)(8)(c);

Master Metals must describe the procedures, structures or equipment used to protect water supplies.

53. F-4d Equipment and Power Failure:
OAC 3745-50-44(A)(8)(d);

Master Metals must describe the procedures, structures, or equipment used to mitigate the effects of equipment failure and power outage.

G **CONTINGENCY PLAN**

54. G-3 Implementation:
OAC 3745-54-52(A); 3745-54-56(D); 3745-50-44(A)(7);

a. Master Metals must list and detail specific criteria that the emergency coordinator will utilize to evaluate (in addition to fires and major spills) explosions, material release, or natural disasters to determine if the contingency plan should be implemented.

b. Master Metals must list who calls the fire department in the event of an uncontrollable fire.

c. Master Metals must address spills of lead dross and flue dust.

d. Master Metals must differentiate in the descriptions of measures taken in the event of spills, major and minor spills to determine when the contingency plan should be implemented.

e. Master Metals must describe who the Contingency Team Members are and what is their role in the event of an emergency.

55. G-4b Identification of Hazardous Materials:
OAC 3745-54-56(B); 3745-50-44(A)(7);

Master Metals must describe the procedures for identification of hazardous materials in the event of an emergency.

56. G-4c Assessment:
OAC 3745-54-56(C) & (D); 3745-50-44(A)(7);

Master Metals must describe the criteria used to assess the possible hazards to human health or the environment as a result of fire, material release, or explosion, and the need for evacuation and notification of authorities.

57. G-4d Control Procedures:
OAC 3745-54-52(A); 3745-50-44(A)(7);

a. Master Metals must specify control procedures to be taken in the event of a fire, explosion, or release. The detailed description must include duties of personnel and types of equipment involved.

b. Master Metals must indicate that materials recovered as the result of major spills will be managed under all applicable requirements of the hazardous waste rules.

c. Master Metals must clearly describe or reference the decontamination efforts used for cleaning of equipment and containers prior to their re-use.

58. G-4e Prevention of Recurrence or Spread of Fires, Explosions or Releases:
OAC 3745-54-56(E); 3745-50-44(A)(7);

Master Metals must describe the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, reoccur or spread to other hazardous waste at the facility.

59. G-4f Storage and Treatment of Released Material:
OAC 3745-54-56(G); 3745-50-44(A)(7);

Master Metals must indicate how it will provide for the storage, treatment or disposal of any material that results from a release, fire or explosion at the facility.

60. G-4g Incompatible Waste:
OAC 3745-54-56(H)(1); 3745-50-44(A)(7);

Master Metals must describe provisions for the prevention of incompatible waste from being treated, stored, or located in the affected areas until clean-up procedures are completed.

61. G-4h Post Emergency Equipment Maintenance:
OAC 3745-54-56(H)(2); 3745-50-44(A)(7);

Master Metals must describe the procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed. Master Metals must also indicate it will notify the Ohio EPA and appropriate local agencies once it has completed the above measures.

62. G-4i Container Spills and Leakage:
OAC 3745-54-52; 3745-55-71; 3745-50-44(A)(7);

Master Metals must specify the procedures to be used when responding to container spills or leakage. Such procedures should be detailed and include all clean-up procedures and timing for immediate removal of spilled wastes and repair or replacement of the containers.

63. G-4j(1) Tank Spills and Leakage: Stopping Waste Addition:
OAC 3745-55-96(A);

Master Metals must provide, for the tank systems or secondary containment systems from which there has been a leak or spill, or which is unfit for use, documentation that it will immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of release.

64. G-4j(2) Tank Spills and Leakage: Removing Waste:
OAC 3745-55-96(B);

Master Metals must specify that if a release is from the tank system, within 24 hours after detection of the leak, or within the earliest practicable time, it will remove as much of the waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed. If the material released was to a secondary containment system, Master Metals must specify that all of the released materials will be removed within 24 hours or in a timely manner as is possible to prevent harm to human health or the environment.

65. G-4j(3) Tank Spills and Leakage: Containment of Visible Releases:
OAC 3745-55-96(C);

Master Metals must specify that a visual inspection of a release from the tank systems will be immediately conducted. Master Metals must provide demonstration that it will, based on visual inspection, prevent further migration of the leak or spill to soils or surface waters. Master Metals must indicate that any visible contamination of the soil or surface water will be removed and properly disposed.

66. G-4j(4) Tank Spills and Leakage: Notifications, Reports:
OAC 3745-55-96(d);

Master Metals must demonstrate that it will, in the event of a spill from the tank system, notify the Ohio EPA of a release to the environment within 24 hours.

67. G-4j(5) Provision of Secondary Containment, Repair or Closure:
OAC 3745-55-96(e);

Master Metals must repairs to the tank system will be made prior to the system being put back into service.

68. G-6 Coordination Agreements:
OAC 3745-54-52(C); 3745-54-37; 3745-50-44(A)(7);

a. Master metals must describe the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of an emergency. Master Metals must include copies of return receipts and document any refusals to enter into a coordination agreement.

b. Master Metals must provide documentation that a copy of the facility Contingency Plan has been provided to all local and state emergency service authorities who may be called upon to respond to an emergency at the facility.

69. G-8 Required Reports:
OAC 3745-54-56(J); 3745-50-44(A)(7);

a. Master Metals must state that the written report of any emergency incident will be part of the facility's operating record.

b. Master Metals must describe the provisions for submission of emergency incident reports to the Director in writing within 15 days of occurrence, and maintenance of records identifying the time, date, and details of an emergency incident.

H **PERSONNEL TRAINING**

70. H-1a Job Titles/Job Descriptions:
OAC 3745-54-16(D)(1) & (2); 3745-50-44(A)(12);

a. Master Metals must provide a job title and job description for every employee whose position at the facility is related to hazardous waste management.

b. Master Metals must provide an organizational chart that is used to supplement comment H-1a (a) above.

71. H-1b Training Content, Frequency and Techniques:
OAC 3745-54-16(C); 3745-54-16(D)(3); 3745-50-44(A)(12);

Master Metals must indicate if initial and sixth month training is the same as continuing annual training. If the training is different, Master Metals must provide a description of initial and sixth month training provided for new employees.

72. H-1c Training Director:
OAC 3745-54-16(A)(2); 3745-50-44(A)(12);

Master Metals must demonstrate that the RCRA training program is directed by a person trained in hazardous waste management. Master Metals must provide the qualifications and the amount of course work that the training director has completed. Attach any relevant course outlines.

73. H-1d Relevance of Training to Job Position:
OAC 3745-54-16(A)(2); 3745-50-44(A)(12);

a. Master Metals must demonstrate that facility personnel are instructed in hazardous waste management procedures (including contingency plan implementation and container labeling) relevant to their positions.

b. Master Metals must provide a table that clearly indicates the training required for each position that is associated with hazardous waste operations.

74. H-1e Training For Emergency Response:
OAC 3745-54-16(A)(3); 3745-50-44(A)(12);

a. Master Metals must demonstrate that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems.

b. Master Metals must have a training program that includes:

i. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

ii. Communication or alarm systems; and

iii. Response to fires.

75. H-2 Implementation of Training Program:
OAC 3745-54-16(B), (D)(4) and (E); 3745-50-44(A)(12);

a. Master Metals must indicate that training will be or has been successfully completed by facility personnel within six months of their employment or assignment to the facility or transfer to a new position within the facility, whichever is later.

b. Master Metals must indicate that records documenting that the required training has been given to and completed by facility personnel are maintained on-site.

I **CLOSURE PLAN**

76. I-1 Closure Plan:
OAC 3745-55-12(A)(1) & (2), 3745-50-44(A)(13);

a. All partial closures of hazardous waste management units must be certified by both the owner/operator and a qualified, independent registered professional engineer licensed in Ohio. The closure plan must include a statement acknowledging this requirement. Certifications must be submitted within 60 days of completion of closure. The owner/operator's and independent registered professional engineer's certifications of closure must follow the signature requirements found in OAC 3745-50-42. The owner/operator certification statement must include the exact wording found in OAC 3745-50-42(D).

b. At a minimum, indicate that the certification document shall include the following information:

i. the certification statement;
ii. the approved closure plan or reference to the approved plan;
iii. the volume of waste removed or closed in place;
iv. all correspondence regarding closure activity after Ohio EPA approval;
v. details of sampling and analysis methods;
vi. laboratory records;
vii. a narrative describing all activities during closure;
viii. post-closure clean-up documentation; and
ix. signature of owner/operator and of a qualified, independent, registered, professional engineer.

c. The closure plan must specify which hazardous waste units subject to a hazardous waste permit which will remain unclosed and not covered by the submitted closure plan. The Part B Permit must address complete closure of the facility. If partial closures are to take place prior to final closure, the Part B Permit must state this as well.

d. To supplement the map of the facility, provide diagrams or blueprint drawings of the units to be closed, showing dimensions and other construction details, appurtenant structures and relationship to other points or structures on the facility property.

77. I-1b Partial Closure and Final Closure Activities:
OAC 3745-55-12(B)(1) through (B)(7); 3745-50-44(A)(13);

a. Under this section, describe the time and all activities required for partial closure and final closure.

b. The closure plan should clearly state the status of the hazardous waste management units after closure is completed.

c. Indicate the period of use for each hazardous waste unit. Also identify each unit by referencing the appropriate line numbers on the Part A application.

78. I-1d(1)(a) Extension for Closure Time:
OAC 3745-55-13(A) & (B);

It is recommended that Master Metals indicate that closure may exceed the 90 days for treatment, removal or disposal of wastes and/or the 180 days for completion of closure activities.

79. I-1e(1) Inventory Removal:
OAC 3745-55-12(B)(3); 3745-50-44(A)(13);

a. In this section, discuss the methods for removing, transporting, treating, storing or disposing of all hazardous wastes and identify the type(s) of off-site hazardous waste management units to be used. Master Metals must indicate that all wastes will be considered as hazardous and managed and manifested properly to an off-site facility, unless laboratory analyses confirm otherwise.

b. The plan should specify how the owner/operator will minimize or eliminate air emissions related to closure, including nuisance problems such as fugitive dust or odors.

c. Demonstrate that the health and safety plan to be implemented during closure is consistent with or exceeds the guidelines provided in OSHA's 29 CFR 1910.120, 1910.132, 1910.133(a), 1910.134, 1910.135, 1910.136, 1910.1200, and 1926, USEPA's Occupational Health and Safety Manual, and Chapter 9 of US EPA's Standard Operating Safety Guides.

d. Clearly indicate in the health and safety plan the personnel levels of protection, such as determined through use of the U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health, "NIOSH Respirator Decision Logic", of May 1987 (or as updated). The independent engineer and the owner/operator monitoring the cleanup for worker exposure must monitor and make a determination as to what level of personal protective equipment must be used.

e. Include a description of the types of environmental monitoring which will be performed to ensure proper protective equipment for the conditions at hand, including monitoring methods to be used to detect hazardous gases, dust or other air emissions during closure activities.

f. Clearly reference or include contingency plans to deal with emergencies and accidental exposures.

g. The name and telephone number of the emergency coordinator(s) and local emergency officials to be notified in case of emergency during closure must be included in the contingency plans.

h. Personnel decontamination procedures and methods, and proper disposal or decontamination of equipment used during closure activities must be fully described within the closure plan.

i. Determination made by an independent engineer or NE Chemical as to what levels of personnel protective equipment are to be used.

j. A complete, detailed description of the safety program should not be necessary in a closure plan. However, it is important that the plan cite specific documents, including existing safety plans specific to site operations, and list appropriate items of concern. These items may include monitoring equipment, hazard evaluation, site safety plans, standard operating procedures (SOPs), engineering controls, personal protective clothing and equipment, decontamination and emergency procedures.

80. I-1e(5) Closure of Tanks:
OAC 3745-50-44(A)(13); 3745-55-97; 3745-55-12(B)(3);

Master Metals must describe how all hazardous waste residues, contaminated containment system components (liners etc.), contaminated soils, and structures and equipment contaminated with waste will be removed or decontaminated at closure and managed as hazardous waste. Specific requirements of this section can be found under the RCRA Part B Permit Application Checklist Canned Comments revised in August 1989, and in the above cited rules.

END OF COMPLETENESS COMMENTS

PART B REVIEW COMMENTS
MASTER METALS, CLEVELAND
OHD 097-613-871
02-18-0133

TECHNICAL ADEQUACY COMMENTS

A PART A APPLICATION

1. Part A Application:
OAC 3745-50-40 & 41; 3745-50-43; 3745-50-42(A) & (D);

a. Master Metals must indicate whether it will continue to use the process design capacity of 1,000 cubic yards for the waste piles (Code S03). This design capacity was included on the old EPA Form 3510-1 & 3.

b. Under the old EPA Form 3510-1 & 3, Section IV, Description of Hazardous Wastes, it was indicated that process code T04 (other) will be used for EPA waste codes D008 and K069. Clarify on the new EPA Form 8700-23 what process code T04 (other) will signify.

B FACILITY DESCRIPTION

2. B-1 General Description:
OAC 3745-50-44(A)(1);

a. The General Facility Description must be relabeled Section B-1 General Description.

b. Master Metals must provide a clear Site Features Map with a scale, date, legend, and clear labeling of all storage, treatment and disposal areas. For instance, clearly label each bin on site, indicate what "S & R Bldg" stands for, and locate all container storage areas.

c. Description of the Master Metals solid waste management units should be included in the General Description.

3. B-2a General Requirements:
OAC 3745-50-44(A)(19);

a. Master Metals must provide a topographic map with a scale of one inch equal to no more than 200 feet which extends to an area 1000 feet surrounding the facility boundary.

b. Master Metals must indicate if the Flood Insurance Map was from the Federal Insurance Administration. The map must include date of reference, proper title, a scale and map orientation.

c. The current flood insurance map does not adequately define the 100 year flood plain in relation to the facility location.

d. A ten year old Wind Rose (1981) is unacceptable for the Permit application. Master Metals must provide an updated wind rose map that is clearly defined. Further describe the results of the updated wind rose as it pertains to Master Metals.

e. The general location map from the U.S. Department of the Interior Geological Survey needs to be replaced with a clearer version.

f. Master Metals must provide a map that indicates the legal boundaries of the site as described in the "Limited Warranty Deed".

4. B-3a Seismic Standard:
OAC 3745-54-18(A);

The information contained under the seismic standard section 270.14(b)(11)(i-ii) of the current permit application meets the requirements of this section. However, Master Metals needs to properly label this section as B-3a Seismic Standard.

C **WASTE CHARACTERIZATION**

5. C-1 Chemical and Physical Analyses:
OAC 3745-50-44(A)(2); 3745-54-13(A);

a. Under the Waste Characteristic Section, laboratory analyses for flue dust performed by the Central Research Laboratory in 1982, 1983 and 1984 was provided. Master Metals must provide current laboratory analyses on the flue dust from the Hazen Research Laboratory.

b. Master Metals must provide laboratory analysis results for different hazardous waste streams containing lead (D008), in addition to flue dust (K069), and sulfuric acid (D002).

6) C-2 Waste Analysis Plan:
OAC 3745-50-44(A)(3); 3745-54-13; 3745-59-07;

a. Master Metals must provide the job descriptions of those personnel qualified to sign manifests and label hazardous waste shipments.

b. Master Metals must indicate, by job title, who visually inspects first time shipments of material. Include the criteria for such visual inspections.

c. Master Metals must indicate how the weights of off-site and on-site shipments of waste are determined.

d. Master Metals must clearly indicate if generators send a sample of their waste shipment with their Waste Profile Form.

e. Master Metals must indicate by job title, who reviews the Waste Profile Forms and what specifically are the reviewers looking for.

f. Master Metals must indicate the location of all samples that are retained on-site for at least one year.

g. Master Metals must justify why sampling will be performed in the "assay furnace" or by Hazen Research. Further describe what the "assay furnace" is.

h. Master Metals must include a full description of the new inventory tracking system employed at the facility which is used to inspect and if necessary, analyze each movement of hazardous waste designated on the accompanying manifest or shipping papers. Include sample labels and tables where appropriate.

i. Master Metal must indicate if the on-site waste water treatment unit is still used at the facility.

j. Master Metals must address the handling or testing of the battery sludge and battery acid.

k. According to OAC 3745-51-03, Master Metals must provide documentation of claims that materials are not hazardous wastes or excluded from regulation. For the solid wastes received on-site for reclamation, Master Metals must provide appropriate documentation to demonstrate that the material is exempt from regulation. In addition, Master Metals must show that they have the necessary equipment to recycle this material on-site.

7. C-2a Parameters and Rationale:
OAC 3745-54-13(B)(1);

   a. Under this section Master Metals must indicate the parameters chosen for analysis and explain the rationale for their selection.

   b. Master Metals must clearly indicate if laboratory sampling is performed on waste shipments that contain manifest discrepancies.

   c. Master Metals must indicate why testing of incoming shipments does not include testing to determine if the wastes are ignitable, reactive, and corrosive. Changing of testing from EP-Toxicity to Toxicity Characteristic Leaching Procedure (TCLP) is recommended.

   d. Master Metals must indicate if Hazen Research still performs outside physical analyses for the facility.

   e. Master Metals must further describe the physical analyses performed by Hazen Research.

   f. Master Metals must provide or reference the Quality Assurance/Quality Control procedures that are performed by Hazen Research. If this material is referenced, Master Metals must indicate that it will be on file at the facility.

   g. Master Metals must provide the criteria that is used to determine recognizable lead bearing waste.

8. C-2b Test Methods:
OAC 3745-54-13(B)(2);

   a. Master Metals must justify how removed solids from the battery cracking sumps can be designated at D008. Indicate what testing is done to confirm this.

   b. Master Metals must specify the test method used to analyze pH.

   c. Master Metals must specify the test method used to determine the presence of chlorinated solvents.

   d. All testing and sampling methods used to evaluate wastes must be from U.S. EPA Publication SW-846 "Test Methods for the Evaluation of Solid Waste".

9. C-2d Frequency of Analysis:
OAC 3745-54-13(A)(3)(a); 3745-54-13(B)(4);

a. Under this section Master Metals must describe the frequency at which laboratory analyses will be repeated.

b. Master Metals must indicate how often furnace slag is analyzed for hazardous constituents and how often it is sent off-site.

c. Master Metals must further describe what indicators are used for determining if a generator process or operation has changed.

F **PROCEDURES TO PREVENT HAZARDS**

10. F-1a Security Procedures and Equipment:
OAC 3745-50-44(A)(4); 3745-54-14;

Under this section Master Metals must address whether it has a 24-hour surveillance system or a barrier and a means to control entry.

11. F-1a(2)(a) Barrier:
OAC 3745-54-14(B)(2)(a);

a. Master Metals must provide documentation that the fence surrounding the facility is in good repair, secure to its concrete base and will be maintained as necessary to ensure that no unauthorized entry will occur onto the site.

b. Master Metals must describe the purpose of the second entrance gate at the southern end of the facility.

12. F-1a(3) Warning Signs:
OAC 3745-54-14(C);

Master Metals must address the placement of "Danger Unauthorized Personnel Keep Out" on each gate to the facility and at other locations in sufficient numbers to be seen from any approach to the active areas of the facility.

13. F-2a General Inspection Requirements:
OAC 3745-50-44(A)(5); 3745-54-15(A) & (B); 3745-54-33;

a. Master Metals must revise the inspection logs to include inspection of the loading and unloading areas at the facility. These include, at a minimum, the battery unloading area, the drum unloading area, and the bulk materials unloading areas.

b. It is stated that Tom Helms is responsible for conducting the routine inspections of the facility. Rather than giving the names of persons who conduct inspections, Master Metals must give the job titles of persons who may conduct such inspections. In addition, Master Metals should indicate what personnel normally perform inspections, and who are their alternates.

c. Master Metals must include inspection of the decontamination area prior to entering into the main office building in the inspection logs.

14. F-2a(1) Types of Problems:
OAC 3745-54-15(B)(3);

Master Metals must identify specific problems to look for during daily or weekly inspections. Simply stating whether a tarp, drum, bin, emergency equipment is in good or fair condition is not adequate.

15. F-2a(2) Frequency of Inspections:
OAC 3745-54-15(B)(4);

a. Master Metals must describe the frequency of inspection for items on the inspection schedules.

b. Master Metals must address specific areas that are inspected for spills during the daily inspections. Simply providing a "release incident" section on the inspection sheets that generally asks for spills or leaks without specifying areas is unacceptable.

16. F-2b(1) Container Inspection:
OAC 3745-55-74;

Master Metals must demonstrate that the containers and the container storage areas will be inspected weekly for leaks, spills and deterioration caused by corrosion or other factors.

17. F-4a Unloading Operations:
OAC 3745-50-44(A)(8)(a);

a. Master Metals must reference the procedures that are followed by personnel involved in unloading operations in the event of an emergency. Indicate if emergency procedures are different for battery, bulk and container unloading areas.

b. Master Metals must clearly describe the structures that are used at each unloading area to prevent hazards. The Permit application mentions only the use of an 8 inch thick concrete pad.

c. Master Metals must indicate what equipment is used to minimize spillage of materials and/or clean up a spillage of materials at the unloading areas. Include a description of the front end loader.

d. It is indicated in the Part B application that "all spills are immediately cleaned up" at the unloading areas, yet, in addition, "facility housekeeping and cleaning of these handling areas collects any materials spilled on the concrete surface". Master Metals must address this discrepancy. Include an explanation of why facility housekeeping staff routinely clean up spilled materials at unloading areas.

e. Master Metals must indicate who evaluates minor and major spills at the unloading areas.

f. Master Metals must describe the equipment that is used by the facility housekeeping staff to clean up spills in the unloading areas.

g. Included in the Permit application is descriptions of storage control section for batteries and lead flue dust K069. Master Metals must place such descriptions under Section D Process Design of the application for proper evaluation.

18. F-4b Run-off:
OAC 3745-50-44(A)(8)(b);

a. Master Metals must reference that portion of the Part B application in section D that contains 24" x 36" blueprints describing the berm around the perimeters of the unloading areas. The map contained in the permit application, assumed to be such a map, is neither properly referenced or labeled. This map must point out the battery cracking unloading area and the bulk unloading area.

b. Master Metals must further describe how materials are removed from the collection sump and underground tank that collects rainwater and battery acid. Master Metals must indicate how often the sump and tank are emptied and how Master Metals knows when to empty them. Master Metals must describe the use of pumps to transfer material out of the sump and tank.

c. Master Metals must indicate in the Permit application the status of the waste water treatment system.

19. F-4e Personnel Protection Equipment:
OAC 3745-50-44(A)(8)(e);

a. Master Metals must describe the procedures structures, or equipment used to prevent undue exposure of personnel to hazardous waste (e.g. protective clothing).

b. Master Metals must describe how personnel protective equipment was determined for the facility personnel. Include which facility stations require protective equipment. Master Metals must also provide other manufacturer information on all general types of respirators, protective clothing, gloves and helmets used on-site.

c. Master Metals must provide written decontamination procedures for facility personnel. Include a description of the air shower and boot scrubber stations. Master Metals must indicate where and when the protective clothing and masks are disposed.

d. Master Metals must indicate who is the safety director for the facility.

G **CONTINGENCY PLAN**

20. G-1 General Information:
OAC 3745-50-44(A)(7); 3745-54-50 through 56; 3745-54-52(B);

a. The Master Metals Contingency Plan must be a document that can stand on its own so it can be easily distributed. Therefore Master Metals must provide information regarding the exact location of the facility.

b. The Master Metals Contingency Plan must be a document that can stand on its own so it can be easily distributed. Therefore Master Metals must indicate who is operator of the facility.

c. Master Metals must revise the site description to include current facility operations.

d. Master Metals must indicate under this section of the Contingency Plan how sulfuric acid is generated at the facility.

e. Master Metals must provide a site map that clearly indicates all drum, and battery storage areas, as well as location of the acid drain, sump the underground storage tank and aboveground storage tanks. Include the general location of the rotary furnace, loading and unloading areas, and the hydraulic oil building. Such a map must include exact, easily discernable details needed for an emergency plan.

21. G-2 Emergency Coordinators:
OAC 3745-54-52(D); 3745-54-55;

a. Master Metals must provide the names, addresses, office and home phone numbers of all emergency coordinators associated with the facility. Where more than one person is listed as an emergency coordinator, one must be named the primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates.

b. Master Metals must provide job titles and descriptions (including shift designations) of all emergency coordinators.

c. Master Metals must provide a statement of authorization of emergency coordinators to commit necessary resources to the contingency plan.

d. The contingency plan indicates two emergency coordinators for the facility. Master Metals must provide a more representative number of emergency coordinators for the facility.

e. Master Metals must indicate that the emergency coordinators will be responsible for conducting all emergency response measures. The emergency coordinator must be thoroughly familiar with all aspects of the contingency plan, all operations and activities of the facility, the location and characteristics of waste handled, and the location of all records within the facility and the facility layout.

22. G-4a Notification:
OAC 3745-54-56(A);

a. Master Metals must indicate that in the event of an emergency the Ohio EPA Emergency Response Team will be notified using the 24-hour toll free number 1-800-282-9378.

b. Master Metals must clarify in the event of an emergency who calls the phone numbers listed on the emergency telephone list.

23. G-5 Emergency Equipment:
OAC 3745-54-52(E);

The facility emergency equipment map provided is not legible. The map must be replaced with a clearer version.

24. G-7 Evacuation Plan:
OAC 3745-54-52(F); 3745-54-37;

If Master Metals will continue to provide the locations of emergency equipment on the evacuation plan, it must be replaced with a clearer version.

H **PERSONNEL TRAINING**

25. H-1 Outline of the Training Program:
OAC 3745-50-44(A)(12); 3745-54-16(A)(1);

a. This Part B Permit Application contains an outline titled "Hazardous Waste Introductory Training and Refresher Outline". Master Metals must clarify if it will continue to follow such an outline during its annual training events. If Master Metals will not, then it must provide revised outlines of the RCRA annual that is provided for the employees.

b. Master Metals must indicate the number of training hours provided for the annual training program.

c. Master Metals must provide an organizational chart that lists all job descriptions related to the management of hazardous waste on-site. Highlight the emergency coordinator positions.

d. Master Metals must clearly identify who completes and signs manifests. Indicate that such a person receives annual RCRA training.

I **CLOSURE PLAN**

26. I-1c Maximum Waste Inventory:
OAC 3745-55-12(B)(3);

a. The facility description must provide individual descriptions of each hazardous waste management unit. Such descriptions must include all standard chemical names, EPA hazardous waste numbers, and maximum inventories of all hazardous waste stored

or treated at each individual waste management unit. In addition, all hazardous constituents found in the Appendix to OAC 3745- 54-93 associated with each waste stream managed at the facility must be identified.

b. Clarify exactly what inventory records will be used to determine wastes managed at given units and that they will be compared with the Part A Application.

27. I-1d Schedule for Closure:
OAC 3745-55-12(B)(6);

a. Address under this section a schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include the total time to close each hazardous waste management unit and the time required for associated closure activities. This will allow tracking for the progress of closure.

b. The schedule for closure must be revised to specify all critical dates for closure for each unit. Such dates shall include waste removal, rinsing, sampling, dates when the independent engineer or his/her representative will be present, notification of the Ohio EPA inspector and other relevant activities. Since the plan is approved when the Part B Permit is approved, the closure dates will begin when Master Metals notifies the Director that they are closing. The schedule must also indicate that the Ohio EPA inspector responsible for the site will be notified (5) working days prior to the implementation of any critical activity identified in the schedule so that he/she may observe the procedures.

c. Indicate that the qualified, independent, registered, professional engineer or his/her representative shall be present during all critical activities during closure. These critical activities may include, but are not necessarily limited to, soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Ohio EPA reserves the right to request a copy of the engineer's log book for verification purposes prior to confirming that closure was completed in accordance with the approved closure plan.

28. I-1e(2) Disposal or Decontamination of Equipment, Structures, and Soils:
OAC 3745-55-12(B)(4); 3745-55-14;

a. Decontamination:

i. Clearly indicate that an independent engineer will certify the decontamination methods to be used and that a minimum amount of residue remains in accordance with Ohio EPA's rinseate standards.

ii. Estimate the volume of waste material that will be generated by decontamination efforts.

iii. Master Metals must specify the type of equipment and removal protocol to remove contaminated waste, the transportation of the waste and its ultimate storage, treatment or disposal. Specify the type of facility each waste is expected to be sent to.

iv. Provide design details for the equipment decontamination work zones. Information required shall include, but not necessarily limited to, a scale map showing the location of the decontamination areas, (i.e., exclusion, contamination reduction and support zones) materials of construction, liner specifications, and the method of rinseate collection.

v. Reusable equipment (e.g., earth moving equipment and stainless steel soil samplers) may be decontaminated by brushing or scraping debris from the exposed surfaces followed by at least three separate rinses. Although no chemical or physical analysis of the rinseate is required, rinseate must be managed as hazardous waste unless sampling results demonstrate that the rinseate is "non-hazardous". The solid debris shall be managed as solid or hazardous waste or decontaminated soil (meeting risk-based limits discussed below) depending on the wastes in the hazardous waste management unit and the sampling results. Residues and debris generated during closure which are contaminated with wastes specifically listed in OAC Chapter 3745-51 shall be

managed as hazardous wastes. In the absence of analytical data, debris is presumed to be hazardous waste. The equipment decontamination operation shall be managed so that vehicles do not distribute contaminated debris outside of the waste management area.

b. Samples

A clear statement of the "clean" level for soils and rinseates must be provided in the closure plan according to comments below. Evidence of a quality assurance/quality control plan for laboratory analyses must be provided or referenced as well.

i. Background Samples

aa. Clearly indicate that background samples will be taken within the same soil type and stratigraphic unit as the comparison samples. Describe the procedures to be used to verify these observations.

bb. The number of background samples must be clearly indicated in the closure plan. Twelve soil sampling points shall be selected to represent an area not directly affected by any concentrated waste management or product handling activities, unless it can be shown that the area undergoing closure was equally affected by these activities.

cc. The location of background samples must be clearly indicated in the closure plan. Areas to avoid for background sampling include but are not limited to:

1. past waste management areas where solid and/or hazardous wastes or waste waters may have been placed on the ground, areas of concentrated air pollutant deposition (from a definable localized source), or areas affected by the runoff;

2. roads, roadsides, parking lots, areas surrounding parking lots or other paved areas, railroad tracks or railway areas or other areas affected by their runoff;

3. storm drains or ditches presently or historically receiving industrial or urban runoff;

4. spill areas;

5. material handling areas, such as truck or rail car loading areas, or near pipelines;

6. fill areas; and

7. other areas as determined by Ohio EPA.

dd. Ohio EPA reserves the right to reject any proposed background sampling location.

ee. Indicate that background samples shall be analyzed using total constituent analysis.

ff. If any hazardous constituent, identified in the waste and included in the list of constituents submitted by the owner/operator and approved by Ohio EPA, is found to be nondetectable in the background soils, then the owner/operator is to use the method detection limit for the individual constituent as the clean standard.

ii. Naturally Occurring Samples:

Soils in the closure area containing hazardous constituents shown to occur in nearby background soils unaffected by a RCRA unit or any other concentrated waste activities (e.g. air emissions) shall be considered to be contaminated if the

concentration of any hazardous constituent of concern in the soils underlying the RCRA unit exceeds the upper confidence limit (i.e mean concentration plus two standard deviations) for the background concentration of that constituent. Background samples shall be analyzed using total constituent analysis. Background samples need not be analyzed using Toxicity Characteristic Leaching Procedure unless Ohio EPA determines such analysis is appropriate.

iii. Non-Naturally Occurring Soils

For soil areas that may be contaminated with non-naturally occurring hazardous constituents, the soil will be considered to be contaminated if any of these compounds or elements are present above analytical detection limits using methods in U.S. EPA Publication SW-846 "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods." Analytical methods must be referenced to US EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition" (see 40 CFR 260.11 and OAC 3745-50-11).

iv. Rinseate Samples:

aa. As a matter of Ohio EPA policy, the following rinseate standards must be met before the surface of a storage pad treatment tank or other structure can be considered "clean":

1. Fifteen times the public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745- 81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics;

2. If an MCL is not available for a particular contaminant, then fifteen times the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 shall be used as the clean standard; or

3. If the product of fifteen times the MCL or MCLG exceeds 1 mg/l or if nether an MCL or an MCLG is available for a particular contaminant, 1 mg/l shall be used as the clean standards.

If fifteen times the MCL or MCLG is less than the contaminant's analytical detection limit using methods found in U.S. EPA Publication SW-846 (Test Methods for Evaluating Solid Waste: Physical and/Chemical Methods), the SW-846 analytical detection limit shall be used as the clean standard.

bb. Clearly state that the rinseates containing concentrations of hazardous constituents derived from listed wastes which exceed the rinseate standards listed in iv. (aa) above shall be managed as a listed hazardous waste. For characteristic wastes, the rinseate need not be managed as a hazardous waste unless it continues to exhibit one of the characteristics specified in OAC 3745-51.

c. Sampling methods

i. Since this closure plan involves possible soil contamination, Master Metals must determine the full extent of vertical and horizontal soil contamination and contaminant concentrations. The closure plan must explicitly state the intent to define this full extent.

ii. Include within the sampling plan the number of comparison samples and their locations, including both surface points, depths, and area of visual contamination. The locations of comparison soil samples must be selected to determine the full horizontal and vertical extent of all contaminants specified, and sampling should proceed until this extent is determined. The depths of comparison soil samples in the upper 3-4 feet of soil must occur at one foot increments.

iii. The soil sampling plan must clearly indicate the equations used to establish the grid representation for the comparison soil samples.

iv. The sample type (grab or composite) must be clearly indicated in the sampling plan. Compositing of samples should be limited to avoid potential dilution of samples; composites should only be combined from a very small portion of the total area.

v. Soil from sample borings may not be returned to boreholes in the same order in which they were removed. Soil boreholes must be filled with grout or other media approved by Ohio EPA. Soil removed from the boreholes is to be considered hazardous waste and must be managed as a hazardous waste, unless laboratory analyses confirms otherwise.

vi. All sampling methods and equipment must be consistent with US EPA's SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition". The closure plan must describe specific sampling methods and equipment to be used during closure.

vii. Soils contaminated with hazardous constituents derived solely from characteristic wastes as defined by OAC Chapter 3745-51 shall be removed and managed as hazardous waste until sampling results and statistical analyses conducted in accordance with the waste characterization procedures described in

U.S. EPA Publication SW-846 (Chapter 9) indicate otherwise. Soils contaminated with hazardous constituents above background, which do not exhibit a characteristic of a hazardous waste, shall be removed and managed as a solid waste, unless shown to be clean via the risk assessment procedures.

29) I-1e(4) Closure of Containers:
OAC 3745-55-78; 3745-55-12(B)(3);

a. Provide the exact procedures to determine:

i. If the solids from manual scraping of the concrete pads can be reclaimed in the on-site rotary furnaces.

ii. Where the rinseates will be treated.

b. Provide documentation of the approved sewer discharge standards for Master Metals.

c. All concrete pads associated with the units to be closed shall be inspected for cracks by the independent professional engineer responsible for certifying the closure. If cracks in the concrete pads are discovered during the inspection, the underlying soil must be sampled to determine whether contamination of the soil beneath the concrete pads has occurred. Reference detailed descriptions of soil sampling procedures and analytical test methods to be used in these circumstances.

L PART B CERTIFICATION

30. L Part B Certification:
OAC 3745-50-42;

When revisions are submitted for the Part B application, provide an updated closure certification statement.

END OF TECHNICAL ADEQUACY COMMENTS

PART B PERMIT REVIEW

SIGN-OFF SHEET

Facility: MASTER METALS Reviewers: LINDA LAGUNZAD

Ohio I.D. # 02-18-0133

U.S. ID# OHD 097-613-871

Date: OCT 10, 1991

Section	Date	Complete	Technically Adequate	Primary Reviewer
A. Part A Application	10/10/91	✓	✓	Linda Lagunzad
B. Facility Description	10/10/91	✓	✓	Linda Lagunzad
C. Waste Description	10/10/91	✓	✓	Linda Lagunzad
D. Process Information	10/10/91	✓	✓	Linda Lagunzad
E. Ground Water	10/10/91	NA	NA	
F. Procedures to Prevent Hazards	10/10/91	✓	✓	Linda Lagunzad
G. Contingency Plan	10/10/91	✓	✓	Linda Lagunzad
H. Personnel Training	10/10/91	✓	✓	Linda Lagunzad
I. Closure Plan (Excluding Financial Assurance)	10/10/91	✓	✓	Linda Lagunzad
J. Corrective Action				
K. Other Federal Laws				
L. Part B Certification	10/10/91	✓	✓	Linda Lagunzad
Financial Assurance				

District Office to determine adequacy on Sections A through L. Enforcement Group, CO to determine adequacy on Financial Assurance. Engineering Section, CO to make a determination if application is ready for transmittal to HWFB or the Director.

Application approved for transmittal: _____

C.O. Reviewer Date

C.O. Supervisor: _____ C.O. Supervisor: _____

Revision 7, 8/89

Facility Name MASTER METALS
ID No. 03-18-0133 OHD 097-613-871
Date Part B Received
Date Review Due 10-10-91

KEY

CC = completeness comments

TA = technical adequacy comments

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
PART A APPLICATION		N	N	✓		COMPLETENESS COMMENTS SECTION + TA SECTION
FACILITY DESCRIPTION						
B-1	General description	N	N			CC #2; TA #2
B-2	Topographic map					
B-2a	General requirements	N	N			CC #3; TA #3
B-2b	Additional requirements for land disposal facilities	NA	NA			NA
B-3	Location information					
B-3a	Seismic standard	Y	N			TA #4
B-3b	Floodplain standard	Y	N			See CC #4 → #6
B-3b(1)	Demonstration of compliance	Y	N			See CC #4 → #6
B-3b(1)(a)	Flood proofing and flood protection measures; OE	N				CC #4
B-3b(1)(b)	Flood plan	N				CC #5
B-3b(2)	Plan for future compliance with floodplain standard	N				CC #6
B-3b(3)	Waiver for land Storage and Disposal Facilities	NA	NA			NA
B-4	Traffic information	N				CC #7

002L-AH (MASTER)
114E-AH
113A-AA
101s-BK

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C. WASTE CHARACTERISTICS						
C-1	Chemical and physical analyses	N	N			CC #8; TA #5
C-1a	Containerized wastes	N				CC #9
C-1b	Waste in tank systems	N				CC #10
C-1c	Waste in piles	NA	NA			NA
C-1d	Landfilled wastes					
C-1e	Wastes incinerated and wastes used in performance tests					
C-1f	Wastes to be land treated					
C-1g	Wastes in miscellaneous treatment units					
C-2	Waste analysis plan	Y	N			TA #6
C-2a	Parameters and rationale	Y	N			TA #7
C-2b	Test methods	Y	N			TA #8
C-2c	Sampling methods	N				CC # 11
C-2d	Frequency of analyses	Y	N			TA #9
C-2e	Additional requirements for wastes generated off-site	N				CC#12
C-2f	Additional requirements for ignitable, reactive or incompatible wastes	Y	Y			

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C-3	Waste analysis requirements pertaining to land disposal restrictions					
C-3a	Waste characteristization					See CC #13 → #15
C-3a(1)	Waste characteristics: solvent wastes and dioxin containing wastes	NA	NA			NA
C-3a(2)	Waste characteristics: California list wastes	NA	NA			NA
C-3a(3)	Waste characteristics: First third wastes with treatment standards	N				CC #13
C-3a(4)	Waste characteristics: second third wastes with treatment standards	N				CC #14
C-3a(5)	Waste characteristics: Soft hammer wastes	N				CC #15
C-3a(5)(a)	Soft hammer wastes: California list wastes with treatment standards	NA	NA			NA
C-3a(5)(b)	Soft hammer wastes: California list wastes without treatment standards	↓	↓			↓
C-3b	Notification and certification requirements					See CC #16
C-3b(1)	Retention of generator notices and certifications	N				CC #16

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C-3b(2)	Notification and certification for wastes to be further managed	N				CC # 17
C-3b(3)	Notification and certification for soft hammer wastes not subject to California list prohibitions	NA	NA			NA
C-3b(4)	Additional notification and certification requirements for treatment facilities					
C-3b(4)(a)	Wastes with treatment standards expressed as concentrations					
C-3b(4)(b)	Wastes with treatment standards expressed as technologies					
C-3b(4)(c)	California list wastes not subject to treatment standards					
C-3b(4)(d)	Recyclable materials used in a manner constituting disposal					
C-3b(5)	Additional notification and certification requirements for disposal facilities					
C-3b(6)	Notification and certification requirements pertaining to landfill and surface impoundment disposal restrictions					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C-3b(6)(a)	Requirements for treatment storage, and recovery facilities	NA	NA			NA
C-3b(6)(b)	Requirements for treatment and recovery facilities					
C-3b(6)(c)	Requirements for disposal facilities					
C-3c	Additional requirements pertaining to storage of restricted wastes					
C-3c(1)	Restricted wastes stored in containers					
C-3c(2)	Restricted wastes stored in tanks					
C-3c(3)	Storage of liquid PCB wastes					
C-3d	Additional requirements for treatment facilities					
C-3d(1)	Wastes with treatment standards expressed as concentrations in the waste					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
C-3d(2)	Wastes with treatment standards expressed as concentrations in the waste extract	NA	NA			NA
C-3d(3)	California list wastes not subject to treatment standards					
C-3e	Additional requirements for land disposal facilities					
C-3f	Exemptions from and extensions to land disposal restrictions					
C-3f(1)	Case-by-case extensions to an effective date					
C-3f(2)	Exemption from a prohibition					
C-3f(3)	Variance from a treatment standard					
C-3f(4)	Additional requirements for surface impoundments exempted from land disposal restrictions					
C-3f(4)(a)	Treatment of wastes					
C-3f(4)(b)	Sampling and testing					
C-3f(4)(c)	Annual removal of residues					
C-3f(4)(d)	Design requirements					
C-3g	Requirements for land disposal facilities with an approved exemption or extension					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D. PROCESS INFORMATION						
D-1	Containers					
D-1a	Containers with free liquids	N				CC #19
D-1a(1)	Description of container	N				CC #20
D-1a(2)	Container management practices	N				CC #21
D-1a(3)	Secondary containment system design and operation	NA	NA			NA
D-1a(3)(a)	Requirement for the base or liner to contain liquids	↓	↓			↓
D-1a(3)(b)	Containment system drainage					
D-1a(3)(c)	Containment system capacity					
D-1a(3)(d)	Control of run-on					
D-1a(3)(e)	Removal of liquids from containment systems	↓	↓			↓
D-1b	Containers without free liquid					
D-1b(1)	Test for free liquids	N				CC #22
D-1b(2)	Description of containers	N				CC #23
D-1b(3)	Container management practices	N				CC #24
D-1b(4)	Container storage area drainage	N				CC #25
D-2	Tank systems					
D-2a	Tank systems descriptions	N				CC #26
D-2a(1)	Dimensions and capacity	N				CC #27

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-2a(2)	Description of feed systems, safety cutoff, bypass systems, and pressure controls	N				CC # 28
D-2a(3)	Diagram of piping, instrumentation and process-flow	N				CC # 29
D-2a(4)	Ignitable, reactive and incomptaible wastes	N				CC # 30
D-2b	Existing tank system					
D-2b(1)	Assessment of existing tank systems integrity	N				CC # 31
D-2c	New tank systems	N				CC # 32
D-2c(1)	Assessment of new tank system integrity	N				"
D-2c(2)	Description of tank system installation and testing plans and procedures	N				"
D-2d	Containment and detection of releases	N				"
D-2d(1)	Plans and description of the design, construction, and operation of the secondary containment system	N				CC # 33
D-2d(1)(a)	Tank age determination	N				"
D-2d(1)(b)	Requirements for secondary containment and leak detection	N				"
D-2d(1)(c)	Requirements for an external liner, vault, double-walled tank or equivalent device	N				CC # 34

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-2d(1)(d)	Secondary containment and leak detection requirements for ancillary equipment	N				CC#35
D-2d(2)	Requirements for tank systems until secondary containment is implemented	N				CC#36
D-2d(3)	Variance from secondary containment requirements	N				CC#37
D-2d(3)(a)	Variance based on a demonstration of equivalent protection of groundwater and surface water	NA	NA			NA
D-2d(3)(b)	Variance based on a demonstration of no substantial present or potential hazard	↓	↓			↓
D-2d(3)(c)	Exemption based on no free liquids and location inside a building	↓	↓			↓
D-2e	Controls and practices to prevent spills and overflow	N				CC#38
D-3	Waste piles					
D-3a	List of wastes	NA	NA			NA
D-3b	Liner exemption	↓	↓			↓
D-3b(1)	Enclosed dry piles					
D-3b(1)(a)	Protection from precipitation					
D-3b(1)(b)	Free liquids					
D-3b(1)(c)	Run-on protection	↓	↓			↓

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-3b(1)(d)	Wind dispersal control	NA	NA			NA
D-3b(1)(e)	Leachate generation					
D-3b(2)	Alternate design/no migration					
D-3c	Liner engineering report					
D-3c(1)	Liner description					
D-3c(2)	Liner location relative to high water table					
D-3c(3)	Calculation of required soil liner thickness					
D-3c(4)	Liner strength requirements					
D-3c(5)	Liner strength demonstration					
D-3c(6)	Liner/waste compatibility testing results					
D-3c(7)	Liner installation					
D-3c(7)(a)	Synthetic liner seaming					
D-3c(7)(b)	Soil liner compaction					
D-3c(7)(c)	Installation inspection/ testing programs					
D-3c(8)	Liner coverage					
D-3c(9)	Liner exposure prevention					
D-3c(10)	Synthetic-liner bedding					
D-3d	Liner foundation report					
D-3d(1)	Liner foundation design description					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-3d(2)	Subsurface exploration data	NA	NA			NA
D-3d(3)	Laboratory testing data					
D-3d(4)	Engineering analyses					
D-3d(4)(a)	Settlement potential					
D-3d(4)(b)	Bearing capacity and stability					
D-3d(4)(c)	Potential for bottom heave or blow-out					
D-3d(4)(d)	Construction and operational loadings					
D-3d(5)	Foundation installation procedures					
D-3d(6)	Foundation installation inspection program					
D-3e	Leachate collection and removal system					
D-3e(1)	System design and operation					
D-3e(2)	Chemical resistance					
D-3e(3)	Strength of materials					
D-3e(4)	Prevention of clogging					
D-3e(5)	Installation					
D-3e(6)	Maintenance					
D-3f	Run-on control system					
D-3f(1)	Calculation of peak flow					
D-3f(2)	Design and performance					
D-3f(3)	Construction					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-3f(4)	Maintenance	NA	NA			NA
D-3g	Run-off control system					
D-3g(1)	Calculation of peak flow					
D-3g(2)	Design and performance					
D-3g(3)	Construction					
D-3g(4)	Maintenance					
D-3h	Management of collection and holding units					
D-3i	Control of wind dispersal					
D-3j	Groundwater monitoring exemption					
D-3j(1)	Engineered structure					
D-3j(2)	No liquid waste					
D-3j(3)	Exclusion of liquids					
D-3j(4)	Containment system					
D-3j(5)	Leak detection system					
D-3j(6)	Operation of leak detection system					
D-3j(7)	No migration					
D-3k	Treatment within the pile					
D-3k(1)	Treatment process description					
D-3k(2)	Equipment used					
D-3k(3)	Residuals description					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-31	Special management plan for piles containing wastes F020, F021, F022, F023, F026, and F027					
D-31(1)	Waste description	NA	NA			NA
D-31(2)	Soil description					
D-31(3)	Mobilizing properties					
D-31(4)	Additional management techniques					
D-4	Surface impoundments					
D-4a	List of wastes					
D-4b	Liner system exemption requests					
D-4b(1)	Exemption based on existing portion					
D-4b(2)	Exemption based on alternative design and location					
D-4c	Liner system, general items					
D-4c(1)	Liner system description					
D-4c(2)	Liner system location relative to high water table					
D-4c(3)	Loads on liner system					
D-4c(4)	Liner system coverage					
D-4c(5)	Liner system exposure prevention					
D-4d	Liner system foundation					
D-4d(1)	Foundation description					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4d(2)	Subsurface exploration data	NA	NA			NA
D-4d(3)	Laboratory testing data					
D-4d(4)	Engineering analyses					
D-4d(4)(a)	Settlement potential					
D-4d(4)(b)	Bearing capacity					
D-4d(4)(c)	Potential for excess hydrostatic or gas pressure					
D-4e	Liner systems, liners					
D-4e(1)	Synthetic liners					
D-4e(1)(a)	Synthetic liner compatibility data					
D-4e(1)(b)	Synthetic liner strength					
D-4e(1)(c)	Synthetic liner bedding					
D-4e(2)	Soil liners					
D-4e(2)(a)	Material testing data					
D-4e(2)(b)	Soil liner compatibility data					
D-4e(2)(c)	Soil liner thickness					
D-4e(2)(d)	Soil liner strength					
D-4f	Liner system, leachate detection system					
D-4f(1)	System operation and design					
D-4f(2)	Equivalent capacity					
D-4f(3)	Grading and drainage					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4f(4)	System compatibility	NA	NA			NA
D-4f(5)	System strength					
D-4f(5)(a)	Stability of drainage layers					
D-4f(5)(b)	Strength of piping					
D-4f(6)	Prevention of clogging					
D-4g	Liner system, construction and maintenance					
D-4g(1)	Material specifications					
D-4g(1)(a)	Synthetic liners					
D-4g(1)(b)	Soil liners					
D-4g(1)(c)	Leachate detection system					
D-4g(2)	Construction specifications					
D-4g(2)(a)	Liner system foundation					
D-4g(2)(b)	Soil liner					
D-4g(2)(c)	Synthetic liners					
D-4g(2)(d)	Leachate detection system					
D-4g(3)	Construction quality control program					
D-4g(4)	Maintenance procedures for leachate detection system					
D-4g(5)	Liner repairs during operations					
D-4h	Prevention of overtopping					
D-4h(1)	Design features					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-4h(2)	Operating procedure	NA	NA			NA
D-4h(3)	Overtopping prevention					
D-4h(4)	Freeboard requirements					
D-4h(5)	Outflow destination					
D-4i	Dike stability					
D-4i(1)	Engineer's certification					
D-4i(2)	Dike design description					
D-4i(3)	Erosion and piping protection					
D-4i(4)	Subsurface soil conditions					
D-4i(5)	Stability analysis					
D-4i(6)	Strength and compressibility test results					
D-4i(7)	Dike construction procedures					
D-4i(8)	Dike construction inspection program					
D-4j	Special waste management plan for surface impoundments containing wastes F020, F021, F022, F023, F026, and F027					
D-4j(1)	Waste description					
D-4j(2)	Soil description					
D-4j(3)	Mobilizing properties					
D-4j(4)	Additional management techniques					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-5	Incinerators					NA
D-5a	Justification for exemption	NA	NA			
D-5b	Trial burn					
D-5b(1)	New incinerator start-up/ shakedown conditions (reserved)					
D-5b(2)	Trial burn plan					
D-5b(2)(a)	Engineering description of incinerator					
D-5b(2)(b)	Sampling, analysis and monitoring procedures including QA/QC plan					
D-5b(2)(c)	Trial burn schedule					
D-5b(2)(d)	Test protocols					
D-5b(2)(e)	Pollution control equipment operation					
D-5b(2)(f)	Shutdown procedures					
D-5b(2)(g)	New incinerator post-trial burn operation (reserved)					
D-5c	Data in lieu of trial burn					
D-5c(1)	Engineering description of incinerator					
D-5c(2)	Expected incinerator operation					
D-5c(3)	Design and operating condition comparisons					
D-5c(4)	Results of previous trial burns					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-5c(4)(a)	Sampling and analysis techniques	NA	NA			NA
D-5c(4)(b)	Methods and results					
D-5d	Determinations					
D 6	Landfills					
D-6a	List of wastes					
D-6b	Liner system exemption requests					
D-6b(1)	Exemption based on existing portion					
D-6b(2)	Exemption based on alternative design and location					
D-6b(3)	Exemption for monofills					
D-6b(4)	Groundwater monitoring exemption					
D-6b(4)(a)	Engineered structure					
D-6b(4)(b)	No liquid waste					
D-6b(4)(c)	Exclusion of liquids					
D-6b(4)(d)	Containment system					
D-6b(4)(e)	Leak detection system					
D-6b(4)(f)	Operation of leak detection system					
D-6b(4)(g)	No migration					
D 6c	Liner system, general items					
D-6c(1)	Liner system description					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6c(2)	Liner system location relative to high water table	NA	NA			NA
D-6c(3)	Loads on liner system					
D-6c(4)	Liner system coverage					
D-6c(5)	Liner system exposure prevention					
D-6d	Liner system, foundation					
D-6d(1)	Foundation description					
D-6d(2)	Subsurface exploration data					
D-6d(3)	Laboratory testing data					
D-6d(4)	Engineering analysis					
D-6d(4)(a)	Settlement potential					
D-6d(4)(b)	Bearing capacity					
D-6d(4)(c)	Stability of landfill slopes					
D-6d(4)(d)	Potential for excess hydrostatic or gas pressure					
D-6e	Liner system, liners					
D-6e(1)	Synthetic liners					
D-6e(1)(a)	Synthetic liner compatibility data					
D-6e(1)(b)	Synthetic liner strength					
D-6e(1)(c)	Synthetic liner bedding					
D-6e(2)	Soil liners					
D-6e(2)(a)	Material testing data					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6a(2)(b)	Soil liner compatibility data	NA	NA			NA
D-6a(2)(c)	Soil liner thickness					
D-6a(2)(d)	Soil liner strength					
D-6f	Liner system, leachate collection/detection systems					
D-6f(1)	System operation and design					
D-6f(2)	Equivalent capacity					
D-6f(3)	Grading and drainage					
D-6f(4)	Maximum leachate head					
D-6f(5)	System compatibility					
D-6f(6)	System strength					
D-6f(6)(a)	Stability of drainage layers					
D-6f(6)(b)	Strength of piping					
D-6f(7)	Prevention of clogging					
D-6g	Liner system, construction and maintenance					
D-6g(1)	Material specifications					
D-6g(1)(a)	Synthetic liners					
D-6g(1)(b)	Soil liners					
D-6g(1)(c)	Leachate collection/detection systems					
D-6g(2)	Construction specifications					
D-6g(2)(a)	Liner system foundation					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6g(2)(b)	Soil liner	NA	NA			NA
D-6g(2)(c)	Synthetic liners					
D-6g(2)(d)	Leachate collection/detection systems					
D-6g(3)	Construction quality control program					
D-6g(4)	Maintenance procedures for leachate collection/detection system					
D-6g(5)	Liner repairs during operations					
D-6h	Run-on and run-off control systems					
D-6h(1)	Run-on control system					
D-6h(1)(a)	Design and performance					
D-6h(1)(b)	Calculation of peak flow					
D-6h(2)	Runoff control system					
D-6h(2)(a)	Design and performance					
D-6h(2)(b)	Calculation of peak flow					
D-6h(3)	Management of collection and holding units					
D-6h(4)	Construction					
D-6h(5)	Maintenance					
D-6i	Control of wind dispersal					
D-6j	Liquids in landfills					
D-6j(1)	Bulk or noncontainerized free liquids					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-6J(2)	Containers holding free liquids	NA	NA			NA
D-6J(3)	Restriction to small containers					
D-6J(4)	Nonstorage containers					
D-6J(5)	Labpacks					
D-6J(5)(a)	Inside containers					
D-6J(5)(b)	Overpack					
D-6J(5)(c)	Absorbent material					
D-6J(5)(d)	Incompatible wastes					
D-6J(5)(e)	Reactive wastes					
D-6k	Containerized wastes					
D-6l	Special waste management plan for landfills containing wastes F020, F021, F022, F023, F026, and F027					
D-6l(1)	Waste description					
D-6l(2)	Soil description					
D-6l(3)	Mobilizing properties					
D-6l(4)	Additional management techniques					
D-7	Land treatment					
D-7a	Treatment demonstration					
D-7a(1)	Demonstration wastes					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7a(2)	Demonstration data sources	NA	NA			NA
D-7a(2)(a)	Existing literature					
D-7a(2)(b)	Operating data					
D-7a(3)	Laboratory/field testing programs					
D-7a(3)(a)	Toxicity testing					
D-7a(3)(b)	Field plot testing					
D-7a(3)(c)	Laboratory testing					
D-7b	Land treatment program					
D-7b(1)	List of wastes					
D-7b(2)	Operating procedures					
D-7b(2)(a)	Waste application rates					
D-7b(2)(b)	Waste application methods					
D-7b(2)(c)	Control of soil pH					
D-7b(2)(d)	Enhancement of microbial or chemical reactions					
D-7b(2)(e)	Control of soil moisture					
D-7c	Unsaturated zone monitoring plan					
D-7c(1)	Soil-pore liquid monitoring					
D-7c(1)(a)	Sampling location					
D-7c(1)(b)	Sampling frequency					
D-7c(1)(c)	Sampling equipment					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7c(1)(d)	Sampling equipment installation	NA	NA			NA
D-7c(1)(e)	Sampling procedures					
D-7c(1)(f)	Analytical procedures					
D-7c(1)(g)	Chain of custody					
D-7c(1)(h)	Background values					
D-7c(1)(i)	Statistical methods					
D-7c(1)(j)	Justification of Principle Hazardous Constituents					
D-7c(2)	Soil core monitoring					
D-7c(2)(a)	Sampling location					
D-7c(2)(b)	Sampling frequency					
D-7c(2)(c)	Sampling equipment					
D-7c(2)(d)	Sampling procedures					
D-7c(2)(e)	Analytical procedures					
D-7c(2)(f)	Chain-of-custody					
D-7c(2)(g)	Background values					
D-7c(2)(h)	Statistical methods					
D-7c(2)(i)	Justification of Principle Hazardous Constituents					
D-7d	Treatment zone description					
D-7d(1)	Horizontal and vertical dimensions					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7d(2)	Soil survey	NA	NA			NA
D-7d(3)	Soil series descriptions					
D-7d(4)	Soil sampling data					
D-7d(5)	Seasonal high water table					
D-7e	Unit design, construction, operation, and maintenance					
D-7e(1)	Run-on control					
D-7e(2)	Run-off control					
D-7e(3)	Minimizing hazardous constituent run-off					
D-7e(4)	Management of accumulated run-on and run-off					
D-7e(5)	Control of wind dispersal					
D-7f	Food chain crops					
D-7f(1)	Food chain crop demonstration					
D-7f(1)(a)	Demonstration basis					
D-7f(1)(b)	Test procedures					
D-7f(2)	Cadmium-bearing wastes					
D-7f(2)(a)	Crops for human consumption					
D-7f(2)(b)	Animal feed					
D-7g	Waste management plan for land treatment units containing wastes F020, F021, F022, F023, F026, and F027					
D-7g(1)	Waste description					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-7g(2)	Soil description	N/A	N/A			N/A
D-7g(3)	Mobilizing properties					
D-7g(4)	Additional management techniques					
D-7h	Incompatible wastes					
D-8	Miscellaneous units				N/A	
D-8a	Description of miscellaneous units					
D-8b	Waste characterization					
D-8c	Treatment effectiveness					
D-8d	Environmental performance standards for miscellaneous units					
D-8d(1)	Protection of groundwater and subsurface environment					
D-8d(1)(a)	Environmental assessment					
D-8d(1)(b)	Performance standards					
D-8d(2)	Protection of surface water, wetlands, and soil surface					
D-8d(2)(a)	Environmental assessment					
D-8d(2)(b)	Performance standards					
D-8d(3)	Protection of the atmosphere					
D-8d(3)(a)	Environmental assessment					
D-8d(3)(b)	Performance standards				N/A	
D-8e	Monitoring, analysis inspection, response reporting, and corrective action					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
D-8a(1)	Elements of a monitoring program	NA	NA			NA
D-8a(2)	Air monitoring alternatives	↓	↓			↓

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E.	GROUNDWATER MONITORING					
E-1	Exemption from groundwater protection requirements					NA
E-1a	Waste piles	NA	NA			
E-1b	Landfill					
E-1c	No migration					
E-2	Interim status groundwater monitoring data					
E-2a	Description of wells					
E-2b	Description of sampling/ analysis procedures					
E-2c	Monitoring data					
E-2d	Statistical procedures					
E-2e	Groundwater assessment plan					
E-3	General hydrogeologic information					
E-4	Topographic map requirements					
E-5	Contaminant plume description					
E-6	General monitoring program requirements					
E-6a	Description of wells					
E-6b	Description of sampling analysis procedures					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-6c	Procedures for establishing background quality	NA	NA			NA
E-6d	Statistical procedures					
E-6d(1)	Parametric analysis of variance (ANOVA)					
E-6d(2)	Non-parametric ANOVA (based on ranks)					
E-6d(3)	Tolerance or prediction interval procedure					
E-6d(4)	Control chart approach					
E-6d(5)	Alternative approach					
E-7	Detection monitoring program					
E-7a	Indicator parameters, waste constituents, reaction products to be monitored					
E-7b	Groundwater monitoring system					
E-7c	Background groundwater concentration values for proposed parameters					
E-7d	Proposed sampling and analysis procedures					
E-7e	Statistically significant increase in any constituent or parameter identified at any compliance point monitoring well					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-8	Compliance monitoring program					NA
E-8a	Description of the monitoring program	NA	NA			
E-8a(1)	Waste description					
E-8a(2)	Characterization of contaminated groundwater					
E-8a(3)	Hazardous constituents to be monitored in compliance program					
E-8a(4)	Concentration limits					
E-8a(5)	Alternate concentration limits					
E-8a(5)(i)	Adverse effects on groundwater quality					
E-8a(5)(ii)	Potential adverse effects					
E-8a(6)	Engineering report describing groundwater monitoring system					
E-8a(7)	Proposed sampling and statistical analysis procedures for groundwater data					
E-8a(8)	Groundwater protection standard exceeded at compliance point monitoring well					
E-9	Corrective action program					
E-9a	Characterization of contaminated groundwater					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
E-9b	Concentration limits	NA	NA			NA
E-9c	Alternate concentration limits					
E-9c(1)	Adverse effects on groundwater quality					
E-9c(2)	Potential adverse effects					
E-9d	Corrective action plan					
E-9d(1)	Location					
E-9d(2)	Construction detail					
E-9d(3)	Plans for removing wastes					
E-9d(4)	Treatment technologies					
E-9d(5)	Effectiveness of correction program					
E-9d(6)	Reinjection system					
E-9d(7)	Additional hydrogeologic data					
E-9d(8)	Operation and maintenance					
E-9d(9)	Closure and post-closure plans					
E-9e	Groundwater monitoring program					
E-9e(1)	Description of monitoring system					
E-9e(2)	Description of sampling and analysis procedures					
E-9e(3)	Monitoring data and statistical analysis procedures					
E-9e(4)	Reporting requirements					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F. PROCEDURES TO PREVENT HAZARDS						
F-1	Security					
F-1a	Security procedures and equipment	Y	N			TA #10
F-1a(1)	24-hour surveillance system	N				CC #39
F-1a(2)	Barrier and means to control entry					
F-1a(2)(a)	Barrier	Y	N			TA #11
F-1a(2)(b)	Means to control entry	N				CC #40
F-1a(3)	Warning signs	Y	N			TA #12
F-1b	Waiver					
F-1b(1)	Injury to intruder	N				CC #41
F-1b(2)	Violation caused by intruder	N				"
F-2	Inspection schedule					
F-2a	General inspection requirements	Y	N			TA #13
F-2a(1)	Types of problems	Y	N			TA #14
F-2a(2)	Frequency of inspections	Y	N			TA #15
F-2b	Specific process inspection requirements					
F-2b(1)	Container inspection	Y	N			TA #16
F-2b(2)	Tank system inspection					
F-2b(2)(a)	Tank system external corrosion and releases	N				CC # 42

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

	Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-2b(2)(b) Tank system construction materials and surrounding area	N				CC # 43
F-2b(2)(c) Tank system overfilling control equipment	N				CC # 44
F-2b(2)(d) Tank system monitoring and leak detection equipment	N				CC #45
F-2b(2)(e) Tank system cathodic protection	N				CC # 46
F-2b(3) Waste pile inspection					
F-2b(3)(a) Run-on and run-off control system	NA	NA			NA
F-2b(3)(b) Wind dispersal system					
F-2b(3)(c) Leachate collection and removal system					
F-2b(4) Surface impoundment inspection					
F-2b(4)(a) Condition assessment					
F-2b(4)(a)(1) Overtopping control system					
F-2b(4)(a)(2) Impoundment contents					
F-2b(4)(b) Structural integrity					
F-2b(5) Incinerator inspection					
F-2b(5)(a) Incinerator and associated equipment					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-2b(5)(b)	Incinerator waste feed cut-off system and associated alarms	NA	NA			NA
F-2b(6)	Landfill inspection	↓	↓			↓
F-2b(6)(a)	Run-on and run-off control system					
F-2b(6)(b)	Wind dispersal control system					
F-2b(6)(c)	Leachate collection and removal system					
F-2b(7)	Land treatment facility inspection					
F-2b(7)(a)	Run-on and run-off control system					
F-2b(7)(b)	Wind dispersal control system	↓	↓			↓
F-2b(8)	Miscellaneous unit inspections					
F-3	Waiver or documentation of preparedness and prevention requirements					
F-3a	Equipment requirements					
F-3a(1)	Internal communications	N				CC # 47
F-3a(2)	External communications	N				CC # 48
F-3a(3)	Emergency equipment	N				CC # 49
F-3a(4)	Water for fire control	N				CC # 50
F-3b	Aisle space requirement	N				CC # 51

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-4	Preventive procedures, structures, and equipment					
F-4a	Unloading operations	Y	N			TA #17
F-4b	Run-off	Y	N			TA #18
F-4c	Water supplies	N				CC #52
F-4d	Equipment and power failure	N				CC # 53
F-4e	Personnel protection equipment	Y	N			TA #19
F-5	Prevention of reaction of ignitable, reactive, and incompatible wastes					NA
F-5a	Precautions to prevent ignition or reaction of ignitable or reactive wastes	NA	NA			NA
F-5b	General precautions for handling ignitable or reactive waste and mixing of incompatible waste	↓	↓			↓
F-5c	Management of ignitable or reactive wastes in containers					
F-5d	Management of incompatible wastes in containers					
F-5e	Management of ignitable or reactive wastes in tank systems					
F-5f	Management of incompatible wastes in tanks systems					
F-5g	Management of ignitable or reactive wastes placed in waste piles	↓	↓			↓

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
F-5h	Management of incompatible wastes placed in waste piles	NA	NA			NA
F-5i	Management of ignitable or reactive wastes placed in surface impoundments					
F-5j	Management of incompatible wastes placed in surface impoundments					
F-5k	Management of ignitable or reactive wastes placed in landfills					
F-5l	Management of incompatible wastes placed in landfills					
F-5m	Management of ignitable or reactive wastes placed in land treatment units					
F-5n	Management of incompatible wastes placed in land treatment units					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

G. CONTINGENCY PLAN		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
G-1	General information	Y	N			TA #20
G-2	Emergency coordinators	Y	N			TA #21
G-3	Implementation	N				CC #54
G-4	Emergency response procedures					
G-4a	Notification	Y	N			TA #22
G-4b	Identification of hazardous materials	N				CC #55
G-4c	Assessment	N				CC #56
G-4d	Control procedures	N				CC #57
G-4e	Prevention of recurrence or spread of fires, explosions, or releases	N				CC #58
G-4f	Storage and treatment of released material	N				CC #59
G-4g	Incompatible waste	N				CC #60
G-4h	Post-emergency equipment maintenance	N				CC #61
G-4i	Container spills and leakage	N				CC #62
G-4j	Tank spills and leakage					
G-4j(1)	Stopping waste addition	N				CC #63
G-4j(2)	Removing waste	N				CC #64
G-4j(3)	Containment of visible releases	N				CC #65
G-4j(4)	Notifications, reports	N				CC #66

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
G-4j(5)	Provision of secondary containment, repair or closure	N				CC # 67
G-4k	Surface Impoundments spills and leakage					NA
G-4k(1)	Emergency repairs					
G-4k(1)(a)	Stopping waste addition	NA	NA			
G-4k(1)(b)	Containing leaks					
G-4k(1)(c)	Stopping leaks					
G-4k(1)(d)	Preventing catastrophic failure					
G-4k(1)(e)	Emptying the impoundment					
G-4k(2)	Certification					
G-4k(3)	Repairs as a result of sudden drop					
G-4k(3)(a)	Existing portions of surface impoundment					
G-4k(3)(b)	Other portions of surface impoundment					
G-5	Emergency equipment	Y	N			TA # 23
G-6	Coordination agreements	N				CC # 68
G-7	Evacuation plan	Y	N			TA # 24
G-8	Required reports	N				CC #69

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
II. PERSONNEL TRAINING						
II-1	Outline of the training program	Y	N			TA # 25
II-1a	Job title/job description	N				CC # 70
II-1b	Training content, frequency, and techniques	N				CC # 71
II-1c	Training director	N				CC # 72
II-1d	Relevance of training to job position	N				CC # 73
II-1e	Training for emergency response	N				CC # 74
II-2	Implementation of training program	N				CC # 75

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I. CLOSURE PLANS, POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS						
I-1	Closure plans	N				CC #76
I-1a	Closure performance standard	Y	Y			
I-1b	Partial closure and final closure activities	N				CC #77
I-1c	Maximum waste inventory	Y	N			CC #26
I-1d	Schedule for closure	Y	N			CC #27
I-1d(1)	Time allowed for closure	"	"			"
I-1d(1)(a)	Extension for closure time	N				CC #78
I-1e	Closure procedures	Y	Y			
I-1e(1)	Inventory removal	N				CC #79
I-1e(2)	Disposal or decontamination of equipment, structures and soils	Y	N			TA #28
I-1e(3)	Closure of disposal units/ contingent closures	NA	NA			NA
I-1e(3)(a)	Disposal impoundments	↓	↓			↓
I-1e(3)(a)(i)	Elimination of liquids					
I-1e(3)(a)(ii)	Waste stabilization					
I-1e(3)(b)	Cover design					
I-1e(3)(c)	Minimization of liquid migration					
I-1e(3)(d)	Maintenance needs					
I-1e(3)(e)	Drainage and erosion	↓	↓			↓

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-1e(3)(f)	Settlement and subsidence	NA	NA			NA
I-1e(3)(g)	Cover permeability					
I-1e(3)(h)	Freeze/thaw effects					
I-1e(4)	Closure of containers	Y	Y			TA # 29
I-1e(5)	Closure of tanks	N				CC # 80
I-1e(6)	Closure of waste piles	NA	NA			NA
I-1e(7)	Closure of surface impoundments	NA	NA			NA
I-1e(8)	Closure of incinerators					
I-1e(9)	Closure of landfills					
I-1e(10)	Closure of land treatment facilities					
I-1e (10)(a)	Continuance of treatment					
I-1e (10)(b)	Vegetative cover					
I-1e(11)	Closure of miscellaneous units					
I-2	Post-closure plan/contingent post-closure					
I-2a	Inspection plan					
I-2b	Monitoring plan					
I-2c	Maintenence plan					
I-2d	Land treatment					
I-2e	Miscellaneous units					
I-2f	Post-closure security					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-2g	Post-closure contact	NA	NA			NA
I-3	Notices required for disposal facilities	↓	↓			↓
I-3a	Certification of closure					
I-3b	Survey plat					
I-3c	Post-closure certification					
I-3d	Post-closure notices	↓	↓			↓
I-4	Closure cost estimate					
I-5	Financial assurance mechanism for closure					
I-5a	Closure trust fund					
I-5b	Surety bond					
I-5b(1)	Surety bond guaranteeing payment into a closure trust fund					
I-5b(2)	Surety bond guaranteeing performance of closure					
I-5c	Closure letter of credit					
I-5d	Closure insurance					
I-5e	Financial test and corporate guarantee for closure					
I-5f	Use of multiple financial mechanisms					
I-5g	Use of financial mechanism for multiple facilities					
I-6	Post-closure cost estimate					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-7	Financial assurance mechanism for post-closure care					
I-7a	Post-closure trust fund					
I-7b	Surety bond					
I-7b(1)	Surety bond guaranteeing payment into a post-closure trust fund					
I-7b(2)	Surety bond guaranteeing performance of post-closure care					
I-7c	Post-closure letter of credit					
I-7d	Post-closure insurance					
I-7e	Financial test and corporate guarantee for post-closure care					
I-7f	Use of multiple financial mechanisms					
I-7g	Use of a financial mechanism for multiple facilities					
I-8	Liability requirements					
I-8a	Coverage for sudden accidental occurrences					
I-8a(1)	Endorsement of certification					
I-8a(2)	Financial test or corporate guarantee for liability coverage					

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
I-8a(3)	Use of multiple insurance mechanisms	____	____	____	____	_____
I-8b	Coverage for nonsudden accidental occurrences					_____
I-8b(1)	Endorsement or certification	____	____	____	____	_____
I-8b(2)	Financial test or corporate guarantee for liability coverage	____	____	____	____	_____
I-8b(3)	Use of multiple insurance mechanisms	____	____	____	____	_____
I-8c	Request for variance	____	____	____	____	_____
I-9	State mechanisms					_____
I-9a	Use of state-required mechanism	____	____	____	____	_____
I-9b	State assumption of responsibility	____	____	____	____	_____

COMPLETENESS/TECHNICAL EVALUATION CHECKLIST

		Complete (Y/N)	Technically Adequate (Y/N)	See Attached Comment	See Attached Exhibit	Location of Information
J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS						
J-1	Solid waste management units					
J-1a	Characterize the solid waste management unit					
J-1b	No solid waste management units					
J-2	Releases					
J-2a	Characterize releases					
J-2b	No releases					
K. OTHER FEDERAL LAWS						
L. PART B CERTIFICATION		Y	N			TA #30

inter-office communication

to: Paul Anderson, DSHWM, NEDO date: 12/21/90

from: Ed Lim, DSHWM, CO

subject: Master Metals (OHD 097 613 871, Ohio 02-18-0133)

I have your December 18, 1990 IOC regarding Master Metal's permit status. However, a permit-by-rule requires an affirmative act by OEPA and a public notice (see attached letter to Clark Oil).

In order to provide Master Metals with a permit by rule for those hazardous waste management units or activities that are now subject to the permitting requirements as a result of new rules or changes in existing rules, we must determine that the provisions of OAC 3745-50-40(C) are satisfied.

Please provide, in writing, brief narrative responses to the following regulatory criteria:

1. Submittal of a Part A Application (OAC 3745-50-40(D))

Please indicate the date of the Part A submittal and the rule(s) which the Part A was submitted in response to.

2. Compliance with OAC 3745-50-40(C)(3)

Does the Part A application referred to above, meet the requirements of 3745-50-43?

3. Submission of Part B Application (OAC 3745-50-40(C))

Indicate whether the facility has submitted the Part B application within six months of the Director's Part B call-in.

4. For our convenience, please indicate the process codes with associated design capacities, waste codes and associated process codes affected by this permit by rule.

Once we receive your response that all applicable regulatory requirements have been satisfied by Master Metals, we will through correspondence signed by Linda Welch, inform Master Metals that they are considered to have a permit by rule as specified in OAC 3745-50-40(C).

1995S/28

cc: Dave Sholtis
Tehmton Toorkey

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

[redacted]

April 9, 1990

Mr. Tom Crepeau
OEPA, DSHWM
P.O. Box 1049, 1800 Watermark Drive
Columbus, OH. 43266-1049

Re: Master Metals Inc., Part B Permit

Dear Mr. Crepeau:

Please find enclosed the RCRA Part B Permit Application for Master Metals Inc. Copies have also been sent to OEPA-NEDO, and USEPA, Region V.

We appreciate the additional time granted to update this permit application to accurately reflect the present activities at the Master Metals facility. Please advise Mr. Ed Lim that you have received this Part B Permit Application., and extend our gratitude to him also.

If you have any questions, require additional information, or need extra copies of this permit, please contact me at 216-526-0990. I look forward to working with you in the future.

Respectfully,

ENVISAGE ENVIRONMENTAL INC.

Thomas J. Monito
Regulatory Compliance Manager

ENCL. RCRA Part B Permit Application

cc: Dave Wertz, NEDO, OEPA
Lisa Pierard, USEPA, Region V.
Doug MIckey, Master Metals

OhioEPA
State Of Ohio Environmental Protection Agency
P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565

Richard F. Celeste, Governor

June 16, 1986

Re: Master Metals
US EPA ID No.: OHD097613871

RECEIVED
JUN 20 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

Mr. George Hamper, Chief
Technical Programs Section, Ohio Unit
US EPA, Region V, 5HW-15
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Hamper:

The Division of Solid and Hazardous Waste Management has completed the second round completeness review on the Part B application submitted by the above referenced facility. The application is still considered to be incomplete. The attached comments are as a result of our second round completeness review.

Please have the facility submit any response or supplementary information as follows:

One copy to Mark Bergman, NEDO

Two copies to Tom Crepeau, Manager, Data Management Section

If you have any questions about this review, please contact Mark Bergman at (216) 425-9171.

Sincerely,

Tom Carlisle
Acting Section Manager, Engineering Section
Division of Solid and Hazardous Waste Management

BD/ds

cc: Charles Taylor, Chief, DSHWM
Martha Gibbons, DSHWM
Rose Freeman, US EPA, Region V
Mark Bergman, NEDO
Bolaji Dosunmu, Engineering Section, DSHWM

1660R(33)

COPY 2

395-7

COMPLETENESS REVIEW COMMENTS
MASTER METALS
OHD097613871

1. Provide information as to whether or not the waste pile will generate leachate as required by 40 CFR 264.250(c)(4).

2. Please specify the frequency of inspection of the pile as required by 40 CFR 264.15 and 264.253(a)(3).

3. Provide information with respect to communications and or alarm systems (internal and external) as specified under 40 CFR 264.52(e).

4. Please provide home addresses and phone numbers of the emergency coordinators as required under 40 CFR 264.52(d) and 264.55.

5. Notification procedures need to provide in case of an emergency as required under 40 CFR 264.56(a)(1).

6. There was no mentioning of groundwater monitoring or detection programs or if there is a need.

7. Provide proof of coordination agreements (written document) as required under 40 CFR 264.52(c).

8. Need to provide information in regards to required reports as outlined in 40 CFR 264.56(j).

9. Please outline and discuss in detail the available emergency equipment at the facility and make references where applicable as required under 264.52(e).

10. Outline of training program, job title and job description should be provided as required under 40 CFR 264.16(d)(1), etc.

11. Need to address closure performance standard as required by 40 CFR 264.111.

12. Proof of liability insurance needs to be provided as required under 40 CFR 264.147.

1751R(1)

Site ID Number OHD 097 613 871
Document No. 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HS-JCK-13

JAN 16 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas Mickey, President
Masters Metals Inc.
2850 W. Third Street
Cleveland, Ohio 44113

RE: Notice of Deficiency
Masters Metals Inc.
OHD 097 613 871

Dear Mr. Mickey:

Thank you for the submittal of your Part B Resource Conservation and Recovery Act (RCRA) permit application. This letter is to notify you that we have reviewed the application and found that in its present format it is difficult to review for completeness. One copy of the application is being returned to you for revision.

Enclosed please find a copy of the completeness checklist with comments. A great deal of the required information is missing and much of the information which was submitted was inadequate in meeting the requirements for completeness. The checklist should be used to revise your permit application. Also enclosed you will find the relevant pages from the Subject Requirement list, which gives details about the required information. It will aid you in preparing an adequate Part B application to follow the format of the completeness checklist and to provide the level of detail which is requested in the Subject Requirement list. Please review these enclosures and incorporate them into your revised permit application. Submit 2 copies of the Part B to this office within 60 days of receipt of this letter. You should also provide 2 copies of the Part B to the Ohio EPA in Columbus and 1 copy to the district office in Twinsburg as they are assisting in the review of your application.

Upon receipt of the revised Part B, we will begin the review for completeness as required by 40 CFR 124.3(c). Please be advised that this review will be an initial, cursory overview of your application and that additional information may be requested before a technical evaluation can begin.

JAN 1 6 1986

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas Mickey, President
Masters Metals Inc.
2850 W. Third Street
Cleveland, Ohio 44113

RE: Notice of Deficiency
Masters Metals Inc.
OHD 097 613 871

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Upon receipt of the revised Part B, we will begin the review for completeness as required by 40 CFR 124.3(c). Please be advised that this review will be an initial, cursory overview of your application and that additional information may be requested before a technical evaluation can begin.

(Comments are 395-4

395-5

Please contact Ms. Mary Logan of my staff at (312) 886-9288, if you have any questions or require further assistance. The Ohio EPA permit application reviewer is Mr. Mark Bergman. He can be reached at (216) 425-9171.

Sincerely,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures: Part B Completeness Checklist
Subject Requirement List (relevant pages)
Part B Application, Copy 2

cc: Chris Bowers, OEPA
Mark Bergman, OEPA-NEDO

Please contact Ms. Mary Logan of my staff at (312) 886-9288, if you have any questions or require further assistance. The Ohio EPA permit application reviewer is Mr. Mark Bergman. He can be reached at (216) 425-9171.

Sincerely,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures: Part B Completeness Checklist
Subject Requirement List (relevant pages)
Part B Application, Copy 2

cc: Chris Bowers, OEPA
Mark Bergman, OEPA-NEDO

bcc: Mary Logan

5HS-JCK-13:M.Logan:GGW:Disk #7:1-8-86:

1/10/86

	TYP.	ASTNT.	R. CHIEF	R. CHIEF	R. CHIEF	BRANCH CHIEF	SEC. CHIEF	BR. CHIEF	[illegible] CHIEF	[illegible] DIR
INIT. DATE	GGW 1/8/86	MPL 1/9/86					Acting 1/9/86	1/13/86		

APR 10 1986

5HS-JCK-13

Thomas Crepeau, Chief
Permits & Manifest Records Section
Division of Solid and Hazardous
Waste Management
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43266

RE: First Notice of Deficiency Response
Masters Metals Inc.
OHD 097 613 871

Dear Mr. Crepeau:

The above-referenced facility has notified us that two copies of the information requested in the January 16, 1986, Notice of Deficiency letter have been forwarded directly to your agency. We request that you respond to the facility's comments so that they are received in our office no later than June 13, 1986.

Please contact Ms. Mary Logan, the U.S. Environmental Protection Agency permit writer for this facility, at (312) 886-9288, if you have any questions regarding the application.

Sincerely,

Lisa Pierard, Acting Chief
Ohio Technical Unit
Technical Programs Section

cc: Tom Carlisle, OEPA
Mark Bergman, OEPA-NEDO w/Completeness Checklist

bcc: Rose Freeman
Mary Logan

395-6

5HS-JCK-13:M.Logan:GGW:Disk #7:4-8-86:

Actng

	TYP.	AUTH.	IL CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
INIT.	GGW	MPL					SP			
DATE	4/8/86	4/8/86					4/10/86			

NOV 26 1985

5HS-JCK-13

Thomas Crepeau, Chief
Permits & Manifest Records Section
Division of Solid and Hazardous
Waste Management
Ohio Environmental Protection Agency
361 East Broad Street, P.O. Box 1049
Columbus, Ohio 43216-1049

RE: RCRA Part B Permit Application
Masters Metals Inc.
OHD 097 613 871

Dear Mr. Crepeau:

The above-referenced facility has advised us that three copies of the Part B application have been forwarded directly to your Agency. We request that you prepare (1) a completeness checklist, (2) written comments and (3) either a notice of deficiency letter or notice of completeness letter, forwarding these items so that they are received in our office no later than December 24, 1985.

Please contact Ms. Mary Logan, the U.S. Environmental Protection Agency permit writer for this facility, at (312) 886-9288, if you have any questions regarding the application.

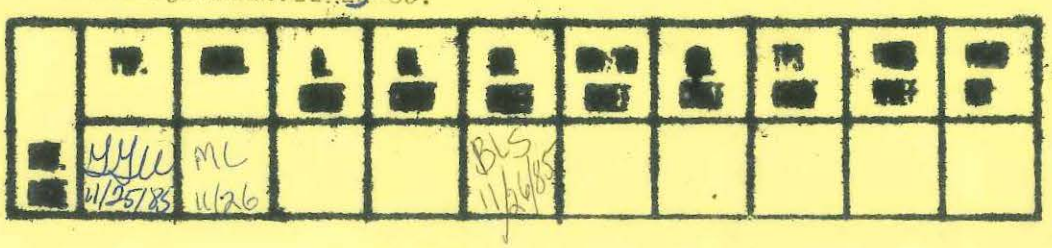
Sincerely,

Rebecca Strom, Acting Chief
Ohio Technical Unit
Technical Programs Section

cc: Chris Bowers, OEPA
Bill Skoronski, NEDO

bcc: Mary Logan

5HS-JCK-13:M.Logan:GGW:11-25-85:



395-3

Re: Application Withdrawal Request
Application No. 02-18-0133

November 23, 1981

Mr. Douglas Mickey, President
Master Metals, Inc.
2850 West Third Street
Cleveland, Ohio 44113

Dear Mr. Mickey:

Your application for a Hazardous Waste Facility Installation & Operation Permit has been reviewed by the staff of the Office of Hazardous Materials Management.

Based on the information submitted by you, it would appear that the operation of your facility does not require a permit for the treatment, storage and/or disposal of hazardous waste pursuant to the requirements set forth in Chapter 3734 of the Ohio Revised Code and applicable hazardous waste rules of the Ohio Administrative Code.

If you have paid an application fee, that amount will be refunded to you under separate letter.

If you have any questions concerning the treatment, storage and/or disposal of hazardous waste at your facility, please contact the appropriate Ohio EPA District Office. A list of these offices and the counties over which they exercise jurisdiction is enclosed for your convenience.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Office of Hazardous Materials Management

PF/maf

Attachment

PERMIT TO OPERATE

City of Cleveland
Division of Air Pollution Control

Permit No. : [illegible]
Issuance Date : [illegible]
Termination Date : [illegible]

Fee $ 50.00

Permission is hereby granted for the operation of :

[illegible] Industries rotary secondary lead smelting furnace.
Furnace emissions will be controlled by a 15000 ACFM baghouse;
[illegible] emissions will be ducted to a 35000 ACFM baghouse.
[illegible] terms and conditions of Ohio EPA Permit #13100002220010
[illegible]

at: [illegible]

Address: 2850 W. 3rd St.
Cleveland, OH 44113

Applicant: [illegible]

Address: 2850 W. 3rd St.
Cleveland, OH 44113

Att'n: [illegible]

This permit does not authorize emissions of air contaminants in excess of City, State and Federal air pollution laws and regulations, nor does it exempt the holder from complying with the requirements of other Departments of the City of Cleveland, as well as State and Federal Agencies.
The Commissioner, or his authorized representative(s) may enter your premises at any reasonable time, or when a source is being operated or when a violation has occurred or may occur, for the purpose of making inspections, conducting tests and examining records or reports pertaining to the above described source of environmental pollutants.
The Commissioner may require this permit to be renewed at an earlier date, as specified in Section 259.06 of the Air Pollution Code of the City of Cleveland.
Breakdown of this equipment shall be reported to this Division in accordance with the procedures outlined in Section 279.01 of said Code.
This permit may be revoked as provided in Section 259.07 of said Code.

COMMISSIONER

APPLICANT COPY

Ohio EPA
State of Ohio Environmental Protection Agency

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 06/07/91 Application No. 1315000222P010

Effective Date 06/07/91 Permit Fee $210

This document constitutes issuance to:

MASTER METALS, INC.
2350 WEST 3RD
CLEVELAND OHIO 44113

of a permit to operate for:

2000 LB/HR ROTARY SECONDARY LEAD SMELTING FURNACE
ROTARY FURNACE NO. 3

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 06/07/94
   You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
   BUREAU OF ENGINEERING SERVICES
   DIV. OF AIR POLLUTION CONTROL 1925 ST. CLAIR
   CLEVELAND, OH 44114 (216) 664-2324
10. ☑ If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schregardus

Director

EPA 3834
Revised 9-90

APPLICATION NUMBER: 13-18-00-0222 P010

FACILITY NAME: MASTER METALS INC.

EQUIPMENT DESCRIPTION: 2500 LB/HR ROTARY SECONDARY LEAD SMELTING FURNACE

COMPANY ID: ROTARY FURNACE NO. 3

SPECIAL TERMS AND CONDITIONS

A. The operations covered by this Permit-to-Operate consist of the charging of battery plates, dross, flue dust, sodium carbonate, coke and/or iron borings into a G & W Industries Rotary Type Secondary Lead Smelting Furnace, the melting/mixing of this material, alloying and the tapping of the molten lead into molds. Particulate emissions generated during these operations are captured by a canopy hood (with side walls and a sliding door) over the charging end of the furnace which is ducted to a 38000 ACFM baghouse control system (which also controls the secondary emissions generated by rotary furnace No. 2 - Ohio EPA Source No. P009) and a hood at the burner end of the furnace which is ducted to a 15000 ACFM soda ash injected baghouse control system . Emissions from this rotary type secondary lead smelting furnace are subject to the New Source Performance Standards (NSPS) requirements of 40 CFR 60.122 "Standard of Performance for Secondary Lead Smelters" and the Best Available Technology (BAT) determination as specified in Ohio EPA Permit-to-Install No. 13-1962 (as ammended March 22, 1991) as follows:

   1. The baghouse control system shall be maintained and operated at sufficient volume flow rate to capture all of the visible emissions (gases) generated by this furnace.

   2. Particulate emissions from the baghouse stacks for this rotary furnace shall not exceed 0.01 grains per dry standard cubic foot of exhaust gases and lead emissions from the baghouse stacks shall not exceed 0.57 pounds per hour.

   3. Sulfur Dioxide emissions from the baghouse stacks for this rotary furnace shall not exceed 3 pounds per hour and a maximum of 15 ppm (by volume) in the exhaust gases.

   4. Visible emissions from the baghouse stacks shall not exceed 10% (ten percent) opacity at any time.

B. During the stack test conducted on March 12, 1991, compliance with the applicable requirements was demonstrated with no visible emissions in excess of 5 % (five percent) opacity [six minute average] in the exhaust gases from the baghouse stack and no visible emission (zero percent opacity) of uncaptured gases.

(Continued)

C. The baghouse control systems shall be maintained and operated in accordance with good engineering practices which includes startups, shutdowns, inspection, maintenance and repair. In addition, these baghouse control systems shall be visually inspected daily (during operating periods) to insure proper opoeration of the cleaning mechanism, pressure drop and other components.

D. Records of baghouse system inspections and any corrective actions taken shall be kept in a bound notebook and shall be maintained for a minimum of 24 months. Such records shall be available for review during normal business hours by authorized personnel from the Cleveland Division of Air Pollution Control (or any other agent of the Ohio EPA) upon request.

E. Any malfunction of this source or its associated air pollution control systems shall be reported immediately to the Ohio EPA field office:

The Cleveland Division of Air Pollution Control
9127 Broadway Avenue
Cleveland, Ohio 44105
Telephone Number: (216) 441-7440
24 Hour Malfunction Number (recorder): (216) 441-7443

in accordance with OAC Rule 3745-15-06 "Malfunction of Equipment; Scheduled Maintenance; Reporting". Except as provided by OAC Rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing either of these baghouse control systems shall be accompanied by the shutdown of this source.

PREPARED BY: Douglas D. Seaman
DATE PREPARED: May 1, 1991

PERMIT TO OPERATE

City of Cleveland
Division of Air Pollution Control

Permit No. : 0132 P009
Issuance Date : 04/30/91
Termination Date : 04/29/93

Fee $ 50.00

Permission is hereby granted for the operation of :

a 4,000 lb./hr G&W Industries 4 meter rotary secondary lead smelting furnace #2. Primary emissions are controlled by a 15,000 ACFM soda ash injected baghouse control system and secondary emissions are controlled by a 30,000 ACFM baghouse control system. Subject to the terms and conditions of Ohio EPA Permit #1319000222P009.
(PTI #13-13-00-0222 P009)

at: Master Metals, Inc. Address: 2850 W. 3rd
Cleveland, OH 44113

Applicant: Master Metals, Inc. Address: 2850 W. 3rd St.
Att'n: Sandra Mercer Cleveland, OH 44113

This permit does not authorize emissions of air contaminants in excess of City, State and Federal air pollution laws and regulations, nor does it exempt the holder from complying with the requirements of other Departments of the City of Cleveland, as well as State and Federal Agencies.
The Commissioner, or his authorized representative(s) may enter your premises at any reasonable time, or when a source is being operated or when a violation has occurred or may occur, for the purpose of making inspections, conducting tests and examining records or reports pertaining to the above described source of environmental pollutants.
The Commissioner may require this permit to be renewed at an earlier date, as specified in Section 259.06 of the Air Pollution Code of the City of Cleveland.
Breakdown of this equipment shall be reported to this Division in accordance with the procedures outlined in Section 279.01 of said Code.
This permit may be revoked as provided in Section 259.07 of said Code.

T. J. Gibbons
COMMISSIONER

APPLICANT COPY

Ohio EPA
State of Ohio Environmental Protection Agency

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 06/07/91

Application No. 1318000222P009

Effective Date 06/07/91

Permit Fee $270

This document constitutes issuance to:

MASTER METALS, INC.
2850 WEST 3RD
CLEVELAND OHIO 44113

of a permit to operate for:

4000 LB/HR ROTARY SECONDARY LEAD SMELTING FURNACE
ROTARY FURNACE NO. 2

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 06/07/94
   You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
   BUREAU OF ENGINEERING SERVICES
   DIV. OF AIR POLLUTION CONTROL 1925 ST. CLAIR
   CLEVELAND, OH 44114 (216) 664-2324
10. [X] If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schregardus

Director

EPA 3834
Revised 9-90

APPLICATION NUMBER: 13-18-00-0222 P009

FACILITY NAME: MASTER METALS INC.

EQUIPMENT DESCRIPTION: 4000 LB/HR ROTARY SECONDARY LEAD SMELTING FURNACE

COMPANY ID: ROTARY FURNACE NO. 2

SPECIAL TERMS AND CONDITIONS

A. The operations covered by this Permit-to-Operate consist of the charging of battery plates, dross, flue dust, sodium carbonate, coke and/or iron borings into a G & W Industries Rotary Type Secondary Lead Smelting Furnace, the melting/mixing of this material, alloying and the tapping of the molten lead into molds. Particulate emissions generated during these operations are captured by a canopy hood (with side walls and a sliding door) over the charging end of the furnace which is ducted to a 38000 ACFM baghouse control system (which also controls the secondary emissions generated by rotary furnace No. 3 - Ohio EPA Source No. P010) and a hood at the burner end of the furnace which is ducted to a 15000 ACFM soda ash injected baghouse control system. Emissions from this rotary type secondary lead smelting furnace are subject to the New Source Performance Standards (NSPS) requirements of 40 CFR 60.122 "Standard of Performance for Secondary Lead Smelters" and the Best Available Technology (BAT) determination as specified in Ohio EPA Permit-to-Install No. 13-1742 as follows:

1. The baghouse control system shall be maintained and operated at sufficient volume flow rate to capture all of the visible emissions (gases) generated by this furnace.

2. Particulate emissions from the baghouse stacks for this rotary furnace shall not exceed 0.01 grains per dry standard cubic foot of exhaust gases.

3. Sulfur Dioxide emissions from the baghouse stacks for this rotary furnace shall not exceed 3 pounds per ton of material produced and a maximum of 15 ppm (by volume) in the exhaust gases.

4. Visible emissions from the baghouse stacks shall not exceed 10% (ten percent) opacity at any time.

B. During the stack test conducted on March 12, 1991 for a similar furnace (Ohio EPA Source No. P010), compliance with the applicable requirements was demonstrated with no visible emissions in excess of 5 % (five percent) opacity [six minute average] in the exhaust gases from the baghouse stack and no visible emission (zero percent opacity) of uncaptured gases.

(Continued)

C. The baghouse control systems shall be maintained and operated in accordance with good engineering practices which includes startups, shutdowns, inspection, maintenance and repair. In addition, these baghouse control systems shall be visually inspected daily (during operating periods) to insure proper opoeration of the cleaning mechanism, pressure drop and other components.

D. Records of baghouse system inspections and any corrective actions taken shall be kept in a bound notebook and shall be maintained for a minimum of 24 months. Such records shall be available for review during normal business hours by authorized personnel from the Cleveland Division of Air Pollution Control (or any other agent of the Ohio EPA) upon request.

E. Any malfunction of this source or its associated air pollution control systems shall be reported immediately to the Ohio EPA field office:

The Cleveland Division of Air Pollution Control
9127 Broadway Avenue
Cleveland, Ohio 44105
Telephone Number: (216) 441-7440
24 Hour Malfunction Number (recorder): (216) 441-7443

in accordance with OAC Rule 3745-15-06 'Malfunction of Equipment; Scheduled Maintenance; Reporting'. Except as provided by OAC Rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing either of these baghouse control systems shall be accompanied by the shutdown of this source.

PREPARED BY: Douglas D. Seaman
DATE PREPARED: May 1, 1991

EPA
Ohio Environmental Protection Agency

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 06/14/91 Application No. 1318000222P006

Effective Date 06/14/91 Permit Fee $270

This document constitutes issuance to:

MASTER METALS, INC.
2850 WEST 3RD
CLEVELAND OHIO 44113

of a permit to operate for:

5 SECONDARY LEAD POT FURNACES (KETTLES)
LEAD POTS 10,12,13,14,15,16

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 06/13/94
   You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
   BUREAU OF ENGINEERING SERVICES
   DIV. OF AIR POLLUTION CONTROL 1925 ST. CLAIR
   CLEVELAND, OH 44114 (216) 664-2324
10. [X] If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R Schregardus

Director

EPA 3834
Revised 9-90

APPLICATION NUMBER: 13-18-00-0222 P006
FACILITY NAME: MASTER METALS INC.
EQUIPMENT DESCRIPTION: 6 SECONDARY LEAD POT FURNACES (KETTLES)
COMPANY ID: LEAD POTS # 10,12,13,14,15,16

SPECIAL TERMS AND CONDITIONS

A. The operations covered by this Permit-to-Operate consist of the melting, alloying & refinning, holding and casting of lead containing materials in 6 secondary lead pot furnaces. During the melting, alloying and refinning operations in any of these pot furnaces, the swing hood (cap) shall be securely attached and ducted to the Norble Sanitary baghouse control system. Particulate emissions from these secondary lead smelting furnace operations are subject to the requirements of OAC Rule 3745-17-07 "Control of Visible Air Contaminants from Stationary Sources", OAC Rule 3745-17-11 "Restrictions on Particulate Emissions from Industrial Processes", OAC Rule 3745-15-07 "Air Pollution Nuisances Prohibited" and OAC Rule 3745-71 "Lead Emissions". These regulations allow a maximum visible emission of 20 % (twenty percent) opacity (six minute average) and no objectionable odors in any exhaust gases from this operation.

B. The Norble Sanitary baghouse control system shall be maintained and operated in accordance with good engineering practices which includes startups, shutdowns, maintenance and repair. In addition, this baghouse shall be visually inspected daily (during operating periods) to insure proper operation of the cleaning mechanism, pressure drop and other components.

C. Records of baghouse system inspections and any corrective actions taken shall be kept in a bound notebook and shall be maintained for a minimum of 24 months. Such records shall be available for review during normal business hours by personnel from the Cleveland Division of Air Pollution Control (or any other agent of the Ohio EPA) upon request.

D. Any malfunction of this source or its associated air pollution control system shall be reported immediately to the Ohio EPA field office:

The Cleveland Division of Air Pollution Control
9127 Miles Avenue
Cleveland, Ohio 44105
Telephone Number: (216) 441-7440
24 Hour Malfunction Number (recorder): (216) 441-7443

in accordance with OAC Rule 3745-15-06 "Malfunction of Equipment; Scheduled Maintenance; Reporting". Except as provided by OAC Rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of this baghouse control system shall be accompanied by the shutdown of this source.

EPA 3164
02/14/83

PREPARED BY: DOUGLAS D. SEAMAN
DATE PREPARED: April 25, 1991